

# **EXHIBIT F**



Deposition of  
**Edward Martin, Jr.**

**Date:** June 4, 2019

**Case:** Eagle Forum, et al. v. Phyllis Schlafly's American Eagles

**No.** 3:16-cv-00946-NJR-RJD

**Court Reporter:** Ann Marie Hollo, CCR, RDR, CRR

Paszkiewicz Court Reporting

Phone: 618-307-9320

Toll-Free: 855-595-3577

Fax: 618-855-9513

[www.spreporting.com](http://www.spreporting.com)

Page 1

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

EAGLE FORUM, et al.,

)

)

Plaintiffs,

)

) Case No.

vs.

) 3:16-CV-00946-NJR-RJD

)

PHYLLIS SCHLAFLY'S AMERICAN

)

EAGLES,

)

)

Defendants.

)

VIDEOTAPED DEPOSITION

OF EDWARD MARTIN, JR.

Taken on behalf of the Plaintiffs

JUNE 4, 2019

Edward Martin, Jr.

June 4, 2019

Page 2

1	QUESTIONS BY:	PAGE
2	MR. SOLVERUD	8
3	INDEX OF EXHIBITS	
4	EXHIBIT	PAGE
5	Plaintiff's Exhibit 1	203
6	Plaintiff's Exhibit 5	235
7	Plaintiff's Exhibit 8	247
8	Plaintiff's Exhibit 9	297
9	Plaintiff's Exhibit 10	310
10	Plaintiff's Exhibit 12	313
11	Plaintiff's Exhibit 13	321
12	Plaintiff's Exhibit 14	327
13	Plaintiff's Exhibit 15	337
14	Plaintiff's Exhibit 16	340
15	Plaintiff's Exhibit 17	342
16	Plaintiff's Exhibits 35 -37	359
17	Plaintiff's Exhibit 43	73
18	Plaintiff's Exhibit 44	88
19	Plaintiff's Exhibit 45	94
20	Plaintiff's Exhibit 53	99
21	Plaintiff's Exhibit 56	113
22	Plaintiff's Exhibit 57	115
23	Plaintiff's Exhibit 59	120
24	Plaintiff's Exhibit 60	129

**Edward Martin, Jr.**

**June 4, 2019**

Page 3

INDEX OF EXHIBITS

EXHIBIT	PAGE
Plaintiff's Exhibit 62	137
Plaintiff's Exhibit 63	139
Plaintiff's Exhibit 64	141
Plaintiff's Exhibit 65	148
Plaintiff's Exhibit 66	149
Plaintiff's Exhibit 67	152
Plaintiff's Exhibit 69	155
Plaintiff's Exhibit 70	159
Plaintiff's Exhibit 73	347
Plaintiff's Exhibit 76	161
Plaintiff's Exhibit 79	14
Plaintiff's Exhibit 80	25
Plaintiff's Exhibit 81	38
Plaintiff's Exhibit 82	166
Plaintiff's Exhibit 83	168
Plaintiff's Exhibit 84	169
Plaintiff's Exhibit 85	186
Plaintiff's Exhibit 86	195
Plaintiff's Exhibit 87	206
Plaintiff's Exhibit 88	219
Plaintiff's Exhibit 89	254

Edward Martin, Jr.

June 4, 2019

Page 4

INDEX OF EXHIBITS

EXHIBIT	PAGE
Plaintiff's Exhibit 90	268
Plaintiff's Exhibit 91	282
Plaintiff's Exhibit 92	289
Plaintiff's Exhibit 93	294
Plaintiff's Exhibit 94	368
Plaintiff's Exhibit 95	384
Plaintiff's Exhibit 96	386
Plaintiff's Exhibit 97	389

(Whereupon the exhibits were attached to the  
transcript.)

**Edward Martin, Jr.**

**June 4, 2019**

Page 5

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

EAGLE FORUM, et al., )  
 )  
Plaintiffs, )  
 ) Case No.  
vs. ) 3:16-CV-00946-NJR-RJD  
 )  
PHYLLIS SCHLAFLY'S AMERICAN )  
EAGLES, )  
 )  
Defendants. )

VIDEOTAPED DEPOSITION OF EDWARD

MARTIN, JR., produced, sworn, and examined on the  
4th day of June 2019, between eight minutes after  
nine o'clock in the forenoon and nine minutes after  
six o'clock in the afternoon of that day, at the law  
office of Spencer Fane LLP, 1 North Brentwood  
Boulevard, Suite 1000, St. Louis, Missouri 63105,  
before Ann Marie Hollo, a Certified Court Reporter  
within and for the State of Missouri, in a certain  
cause now pending before the United States District  
Court For the Southern District of Illinois, wherein  
Eagle Forum, et al., are the Plaintiffs, and Phyllis  
Schlafly's American Eagles are the Defendants.

**Edward Martin, Jr.**

**June 4, 2019**

Page 6

A P P E A R A N C E S

For the Plaintiffs:

Mr. Erik O. Solverud

SPENCER FANE LLP

1 North Brentwood Boulevard

Suite 1000

St. Louis, Missouri 63105

(314) 863-7733

esolverud@spencerfane.com

For the Plaintiff Eagle Forum:

Mr. James P. Sanders

SMITHAMUNDSEN LLC

120 South Central Avenue

Suite 700

St. Louis, Missouri 63105

Jsanderson@salawus.com

For the Defendant PSAE:

Mr. P. Tyler Connor

RIEZMAN BERGER, P.C.

7700 Bonhomme Avenue

7th Floor

St. Louis, Missouri 63105

Ptc@riezmanberger.com

and

Mr. Henry Elster

THE ELSTER LAW OFFICE, LLC

101 South Hanley Street

Suite 1280

St. Louis, Missouri 63105

Henry@elsterlaw.com

For Edward R. Martin, Jr.:

Mr. Daniel Schattnik

UNSELL, SCHATTNIK & PHILLIPS, P.C.

3 South 6th Street

Wood River, Illinois 62095

Schattnik@gmail.com

ALSO PRESENT: Ms. Anne Schlafly Cori

Mr. John F. Schlafly

The Court Reporter: Ann Marie Hollo, CCR, RDR, CRR

The Videographer: Chris Grega, CLVS

**Paszkiewicz Court Reporting**

**(618) 307-9320 / Toll-Free (855) 595-3577**



**Edward Martin, Jr.**

**June 4, 2019**

Page 7

1 THE VIDEOGRAPHER: We are on the  
2 record. This is the videotaped deposition of Edward  
3 Martin, Jr. Today's date is June 4, 2019. The time  
4 is 9:08 a.m. This is the case of Eagle Forum, et  
5 al. versus Phyllis Schlafly's American Eagles, Case  
6 Number 316-CV-00946-NJR-RJD. This case is pending  
7 in the United States District Court for the Southern  
8 District of Illinois.

9 My name is Chris Grega. I'm  
10 representing Paszkiewicz Court Reporting. The court  
11 reporter is Ann Marie Hollo also representing  
12 Paszkiewicz Court Reporting. This deposition is  
13 taking place at Spencer Fane LLP, 1 North Brentwood  
14 Boulevard, St. Louis, Missouri 63105.

15 Counselors, will you please state  
16 your appearance.

17 MR. ELSTER: Henry Elster for  
18 Defendant PSAE.

19 MR. SCHATTNIK: Dan Schattnik for  
20 Edward Martin.

21 MR. CONNOR: Tyler Connor for  
22 Defendant PSAE.

23 MR. SANDERS: James Sanders for Eagle  
24 Forum.

Edward Martin, Jr.

June 4, 2019

Page 8

1 MR. SOLVERUD: Erik Solverud for the  
2 individual plaintiffs.

3 THE VIDEOGRAPHER: Will the court  
4 reporter please swear in the witness.

5 (Deponent sworn.)

6 IT IS HEREBY STIPULATED AND AGREED, by and  
7 between counsel for Plaintiffs and counsel for  
8 Defendants that the deposition may be taken in  
9 shorthand by Ann Marie Hollo, RDR/CRR, a Certified  
10 Court Reporter, and afterwards transcribed into  
11 typewriting; and the signature of the witness is not  
12 expressly waived.

13 \* \* \* \* \*

14 EDWARD MARTIN, JR.,  
15 of lawful age, being produced, sworn and examined on  
16 behalf of the Plaintiff, deposes and says:  
17 (Starting time of the deposition is: 9:08 a.m.)

18 DIRECT EXAMINATION

19 BY MR. SOLVERUD

20 Q. Mr. Martin, Phyllis Schlafly's American  
21 Eagles was created in May of 2016, correct?

22 A. I think if you tell me so. I'm not sure  
23 of the exact date.

24 Q. Okay. But the month was May, and it was

Edward Martin, Jr.

June 4, 2019

Page 9

1 in 2016; is that right?

2 **A. Yeah. Again, sounds right. If you tell**  
3 **me the exact date -- I'm not sure. If there's a**  
4 **filing date or something, but around then, yeah.**

5 Q. And since its creation, Phyllis Schlafly's  
6 American Eagles has competed against Eagle Forum for  
7 donors, right?

8 MR. ELSTER: Objection. Form,  
9 foundation, and to the extent it calls for a legal  
10 conclusion.

11 You can answer subject to that.

12 THE DEPONENT: No.

13 BY MR. SOLVERUD

14 Q. Since its creation, Phyllis Schlafly's  
15 American Eagles has competed against Eagle Forum for  
16 donations, correct?

17 MR. ELSTER: Same objections.

18 THE DEPONENT: I'm sorry. For what?

19 BY MR. SOLVERUD

20 Q. For donations.

21 **A. What was the first question?**

22 Q. Donors.

23 **A. Oh. Still -- the answer is still "no."**

24 Q. Since its creation, Phyllis Schlafly's

Edward Martin, Jr.

June 4, 2019

Page 10

1 American Eagles has competed against Eagle Forum for  
2 supporters?

3 MR. ELSTER: Same objections.

4 BY MR. SOLVERUD

5 Q. Correct?

6 A. Supporters?

7 Q. Yes.

8 A. I'm not sure what that means. What does  
9 "supporters" mean?

10 Q. People that support the organization.

11 MR. ELSTER: Same objections.

12 THE DEPONENT: I don't know what that  
13 means.

14 BY MR. SOLVERUD

15 Q. Okay. So you can't answer that question  
16 then?

17 A. Your question is unclear. I'm asking you  
18 to clarify that. If you won't clarify it, I won't  
19 answer it.

20 Q. That's what I'm trying to establish.

21 A. Supporters is -- I don't know what that  
22 means. In the business of c4, c3, that's a big  
23 term.

24 Q. Okay. Since its creation, Phyllis

Edward Martin, Jr.

June 4, 2019

Page 11

1 Schlafly's American Eagles has competed against  
2 Eagle Forum for influence in conservative politics,  
3 correct?

4 MR. ELSTER: Same objection, and  
5 vague as to "influence."

6 THE DEPONENT: Competed with Eagle  
7 Forum? Eagle Forum's not a competitor. They're  
8 not -- they're not -- they're not active in the same  
9 way that the rest of the work is being done. So  
10 it's not a competition, no.

11 BY MR. SOLVERUD

12 Q. Okay. Has Phyllis Schlafly's American  
13 Eagles competed with Eagle Forum for financial  
14 support?

15 MR. ELSTER: Same objections, and  
16 vague as to "financial support."

17 THE DEPONENT: I'm not sure what that  
18 means. "Financial support," what does that mean? I  
19 don't know.

20 BY MR. SOLVERUD

21 Q. So you can't answer my question?

22 A. I don't know -- understand. I don't  
23 understand the question. Can you clarify it?

24 / / /

Edward Martin, Jr.

June 4, 2019

Page 12

1 Q. You can't answer as stated; is that right?

2 **A. I'm asking you to clarify the question.**

3 Q. Okay. And absent clarification, you can't  
4 answer that question; is that right?

5 MR. ELSTER: Objection. Asked and  
6 answered.

7 THE DEPONENT: Yeah.

8 BY MR. SOLVERUD

9 Q. Okay. And isn't it true that Phyllis  
10 Schlafly's American Eagles has competed with Eagle  
11 Forum for exposure in conservative politics?

12 MR. ELSTER: Objection. Form,  
13 foundation, and vague as to "exposure."

14 THE DEPONENT: Again, the word  
15 "competing" is not accurate.

16 BY MR. SOLVERUD

17 Q. Okay. Why is the word "competing" not  
18 accurate?

19 **A. They're not -- we're not similar enough in**  
20 **terms of what we do, so it's not a competition --**

21 Q. Okay.

22 **A. -- at this point. We're talking about**  
23 **today, right?**

24 Q. Anytime since 2016.

Edward Martin, Jr.

June 4, 2019

Page 13

1           **A.     Right.**

2           Q.     So your testimony is you guys don't  
3 compete against one another since -- at any time  
4 since 2016?

5                     MR. ELSTER:  Objection to the extent  
6 it mischaracterizes his testimony.

7                     THE DEPONENT:  Look.  Ask me the  
8 question again.  I'm sorry.  That's not clear.

9           BY MR. SOLVERUD

10          Q.     Is it your testimony that Eagle Forum and  
11 Phyllis Schlafly's American Eagles have not competed  
12 against one another in any way since its creation in  
13 May of 2016?

14                     MR. ELSTER:  Objection to the extent  
15 it calls for a legal conclusion.

16                     THE DEPONENT:  We do our work.  This  
17 organization does our work, and there's lots of  
18 groups that want to be as capable as we are, so if  
19 that's competition, sure, but that's not -- I  
20 wouldn't describe it like that.  There's  
21 not -- there's not a way that we kind of -- you  
22 measure that competition.

23           BY MR. SOLVERUD

24          Q.     Who is the "we" that you're referring to?

Edward Martin, Jr.

June 4, 2019

Page 14

1           **A.     You're asking about PSAE? Weren't you?**

2           Q.     Yeah.

3           **A.     Well, PSAE, and as I mentioned earlier,**  
4 **the organizations, all the different work we do,**  
5 **what Phyllis put together.**

6           Q.     And when you say, "PSAE," we understand  
7 you're talking about Phyllis Schlafly's American  
8 Eagles, correct?

9           **A.     Well, that's the term that you used,**  
10 **right?**

11          Q.     Yeah.

12          **A.     Yes.**

13          Q.     I didn't use "PSAE"; you did. And I just  
14 want to make sure throughout this deposition, we'll  
15 use the word "PSAE" or "Phyllis Schlafly's American  
16 Eagles" interchangeably; is that fair?

17          **A.     I suppose.**

18                   **(Plaintiff's Exhibit 79 was marked for**  
19 **identification.)**

20 **BY MR. SOLVERUD**

21          Q.     Let me show you a document marked  
22 Exhibit 79.

23                   MR. ELSTER: Thank you.

24     /   /   /



Edward Martin, Jr.

June 4, 2019

Page 15

1 BY MR. SOLVERUD

2 Q. And can you identify Exhibit 79 as a  
3 series of emails exchanged between you, Andy  
4 Schlafly, Bruce Schlafly, John Schlafly, and Roger  
5 Schlafly on November 25, 2016?

6 A. Give me a chance to read it.

7 Q. Sure.

8 A. The second page is empty; is that right?

9 Q. [Indicated.]

10 A. Yes, yes.

11 Q. So do you recall -- so I asked you can you  
12 identify Exhibit 79 as a series of emails exchanged  
13 between you, John Schlafly, Andy Schlafly, Bruce  
14 Schlafly, and Roger Schlafly?

15 A. Well, it appears to be emails that John  
16 and Andy sent. There's no Bruce and Roger, and I  
17 didn't send emails, but this is an email John and  
18 Andy are having exchange. At least one of the  
19 times -- I'm not sure when -- were copied on some of  
20 it, so.

21 Q. Okay. So you're copied on the first email  
22 that was sent on November 25, 2016 at the bottom of  
23 Exhibit 79, correct?

24 A. Could you repeat that? Where is it?

Edward Martin, Jr.

June 4, 2019

Page 16

1 Q. You're copied on the bottom email on  
2 Exhibit 79, correct?

3 A. I'm copied on the -- I'm copied what looks  
4 like the original message. Is that what you mean?

5 Q. Yes, sir.

6 A. Yes.

7 Q. And so this is -- the original message is  
8 an email that John Schlafly sent to you and others  
9 regarding Eagle Forum leasing an office in Alton,  
10 correct?

11 A. I'm sorry. Can you say that again?

12 MR. SOLVERUD: Can you read it back.

13 THE REPORTER: "The original message  
14 is an email that John Schlafly sent to you and  
15 others regarding Eagle Forum leasing an office in  
16 Alton, correct?"

17 MR. ELSTER: Objection to the extent  
18 it mischaracterizes the document. It says, "G6 has  
19 apparently leased."

20 You can answer subject to that.

21 THE DEPONENT: Yeah. I'm not sure if  
22 there's -- there's documents that show -- that can  
23 refresh what this is. I'm not sure if John had seen  
24 a lease, or if there's -- I wasn't -- you know, I'm

Edward Martin, Jr.

June 4, 2019

Page 17

1 not aware of all the conclusions in this, but it  
2 looks like John is -- you know, it's Friday night at  
3 7:00 o'clock. He's sending a message of stuff he  
4 found, yeah. So it reads . . .

5 BY MR. SOLVERUD

6 Q. One of the things that John Schlafly  
7 reports to you is that "If they do business as Eagle  
8 Forum in Alton, Illinois, it will hurt us, perhaps  
9 gravely." Did I read that correctly?

10 **A. You read it correctly.**

11 Q. Okay. What did you understand John  
12 Schlafly to mean by "It will hurt us, perhaps  
13 gravely"?

14 MR. ELSTER: Objection. Calls for  
15 speculation.

16 THE DEPONENT: Yeah, I have no idea.

17 BY MR. SOLVERUD

18 Q. What was your reaction to him telling you  
19 that "Eagle Forum office in Alton, Illinois would  
20 hurt us, perhaps gravely"?

21 **A. I don't recall a reaction to that.**

22 Q. John Schlafly says, "I foresee an  
23 inevitable conflict between their Eagle Forum and  
24 ours." Do you see that?

Edward Martin, Jr.

June 4, 2019

Page 18

1           **A.     Yes.**

2           Q.     What was your understanding as the -- as  
3     to the Eagle Forum that John Schlafly is referring  
4     to as "ours"?

5                     MR. ELSTER:  Objection.  Calls for  
6     speculation.

7                     THE DEPONENT:  What is it?  What is  
8     the first part of that question?

9     BY MR. SOLVERUD

10          Q.     Let me ask it differently.

11          **A.     Okay.**

12          Q.     Mr. Schlafly says, "ours."  Do you see  
13     that?

14          **A.     Yes.**

15          Q.     And do you have an understanding as to  
16     what organization or entity he's referring to as  
17     "ours"?

18                     MR. ELSTER:  Same objection.

19                     THE DEPONENT:  I think ask John.

20     BY MR. SOLVERUD

21          Q.     So you don't know?

22          **A.     Well, I don't remember this email.  If you**  
23     **have something that would refresh my recollection of**  
24     **what this is about.  I don't know.  I don't know**

Edward Martin, Jr.

June 4, 2019

Page 19

1 **what he's referring to there.**

2 Q. Okay. And so as you sit here today, you  
3 don't know what is meant by "ours"? You don't have  
4 any understanding of that; is that right?

5 MR. ELSTER: Objection. Asked and  
6 answered.

7 THE DEPONENT: You asked me what I  
8 thought he meant. I have no idea what John meant.  
9 And, again, if this is about one of the other  
10 organizations, if it was about c4, Eagle Trust, I  
11 can't tell from this, so.

12 BY MR. SOLVERUD

13 Q. Are you done with your answer?

14 **A. Yeah. I mean . . .**

15 Q. Have you had any conversations with John  
16 Schlafly about inevitable conflict between Eagle  
17 Forum and any organization that is being run by John  
18 Schlafly?

19 **A. Being run by John Schlafly?**

20 Q. Mm-hmm.

21 **A. What does that mean?**

22 Q. You can't answer that question either?

23 **A. I just don't understand what "being run by**  
24 **John Schlafly" means.**

Edward Martin, Jr.

June 4, 2019

Page 20

1 Q. Okay.

2 A. If you --

3 Q. So as asked, you can't answer that  
4 question; is that right?

5 A. I asked for clarification.

6 Q. Without clarification, you can't answer  
7 that question, correct?

8 A. I don't know. Now I don't know what the  
9 question is. If you want to read it back to me?  
10 I'm not sure.

11 Q. In response to John Schlafly's email, Andy  
12 Schlafly writes, "If there is a plan to form a  
13 similar organization with its own state  
14 organizations -- I'm in." Do you see that?

15 MR. ELSTER: Objection to the extent  
16 it mischaracterizes the document. It appears to be  
17 quoting some other person.

18 THE DEPONENT: I see that, yes.

19 BY MR. SOLVERUD

20 Q. Okay. Was there a plan in November 25,  
21 2016 to form a similar organization with its own  
22 state organizations?

23 A. I don't recall the timing of when there  
24 would have been, but there would have been

Edward Martin, Jr.

June 4, 2019

Page 21

1 discussions about what to do going forward with all  
2 of our organization and all of our work. This is  
3 just after the election, so there's a lot of  
4 changeover in planning since the election went so  
5 well.

6 Q. PSAE was created in May of 2016. Do you  
7 recall that?

8 A. Yes.

9 Q. Prior to November 25, 2016, were you aware  
10 of any plan to form a similar organization with its  
11 own state organizations?

12 MR. ELSTER: Objection. Form as to  
13 "similar organization." Vague.

14 THE DEPONENT: Yeah. I'm -- again,  
15 when PSAE started, Phyllis was alive, and that's  
16 what she wanted us to do. What form and how that  
17 would take and the other groups would take is -- you  
18 know, how they fit together was an ongoing  
19 discussion.

20 BY MR. SOLVERUD

21 Q. Okay.

22 A. There's lots of talk about how to do that,  
23 but that's -- as of that date, that's what I  
24 remember.

Edward Martin, Jr.

June 4, 2019

Page 22

1 Q. And are you aware of any plan prior to  
2 November 25, 2016 to create or form an organization  
3 similar to Eagle Forum?

4 MR. ELSTER: Objection. Vague as to  
5 "similar organization."

6 THE DEPONENT: There were lots of  
7 plans and discussions of how to move forward,  
8 including how do we develop our state leaders that  
9 want to stay affiliated with Phyllis, so there was  
10 lots of discussion of that. And I don't know  
11 whether that rose to the level of plans, but we  
12 certainly were trying to decide how to go forward.

13 MR. SOLVERUD: Do you want some  
14 water?

15 MR. ELSTER: I can get you some.

16 THE DEPONENT: Sure.

17 MR. ELSTER: Hold on.

18 THE DEPONENT: Thank you.

19 BY MR. SOLVERUD

20 Q. Prior to November 25, 2016, had there been  
21 any discussions about forming a similar organization  
22 to Eagle Forum with state organizations?

23 MR. ELSTER: Same objection.

24 THE DEPONENT: As I said,



Edward Martin, Jr.

June 4, 2019

Page 23

1 when -- after the lawsuit began, there were lots of  
2 discussions about how to move ahead. Phyllis' work  
3 had always been based on state leaders and state  
4 affiliations, so there was lots of discussion of how  
5 to do that. Whether it was only with a c4, c3,  
6 whatever relationships, that was -- that was one of  
7 the things that was going on. I'm not sure of the  
8 timing.

9 BY MR. SOLVERUD

10 Q. Okay. And in response to Andy's email,  
11 John Schlafly sends an email to Andy Schlafly,  
12 copies you, Bruce Schlafly and Roger Schlafly, and  
13 he says, "We're about to drop two mailings totaling  
14 40,000 pieces, and our ability to operate depends  
15 critically on receiving a good response to those  
16 appeals." Did I read that correctly?

17 A. Uh-huh.

18 Q. Do you have any understanding as to what  
19 the mailings totaling 40,000 pieces were?

20 A. I don't recall it right now.

21 Q. Okay. And when John Schlafly says, "Our  
22 ability to operate," do you know what the "our"  
23 refers to?

24 MR. ELSTER: Objection. Speculation.

Edward Martin, Jr.

June 4, 2019

Page 24

1 THE DEPONENT: I don't at this  
2 moment. I'd have to -- I don't at this moment. I  
3 mean, it looks like it's the conversation, but,  
4 again, it's November, and I'm not sure I don't  
5 recall.

6 BY MR. SOLVERUD

7 Q. And on November 25, 2016, did Phyllis  
8 Schlafly's American Eagles' ability to operate  
9 depend critically on receiving a good response to  
10 certain appeals?

11 A. I don't think so.

12 Q. As of November 25, 2016, had Phyllis  
13 Schlafly's American Eagles planned or prepared any  
14 mailings?

15 A. I'm not sure right now, that date. I'm  
16 not sure whether I know an answer. I'd have  
17 to -- if you have something that would refresh that,  
18 I could look at it, but I don't know for sure.

19 Q. Well, this email doesn't refresh your  
20 recollection? Is that what you're saying?

21 A. I don't know what -- to what John's  
22 referring to. It looks to me like I wasn't included  
23 on the second email from Andy. So part of this  
24 would be -- unless I'm reading what you gave me

Edward Martin, Jr.

June 4, 2019

Page 25

1 wrong, I wasn't included on Andy's email at that  
2 time, so some of this may have gone by me at that  
3 time.

4 Q. You eventually got Andy's email?

5 A. Right, but down a thread. If it's obvious  
6 you weren't on the first thread, that's -- as you  
7 probably know, most people don't read down the  
8 bottom. So I'm just not sure about the timing of  
9 knowing what we're referring to in this set of  
10 emails. I mean, there may have been replies by me  
11 to others that I'm not seeing, so I just don't know.

12 (Plaintiff's Exhibit 80 was marked for  
13 identification.)

14 BY MR. SOLVERUD

15 Q. I'll hand you a document marked  
16 Exhibit 80. Let me know when you're done looking at  
17 it.

18 A. Yep.

19 Q. Can you identify Exhibit 80 as including  
20 an email that you sent to Andy Schlafly, John  
21 Schlafly, and Bruce Schlafly on Saturday  
22 November 26, 2016?

23 A. Yes, and I hope it reflects this poem.  
24 It's an excellent poem that I composed, which is in

Edward Martin, Jr.

June 4, 2019

Page 26

1     **there, in that email. I want that to be on the**  
2     **record. The Year of the Eagle.**

3             Q.     In your -- are you done?

4             A.     **I am.**

5             Q.     Okay.

6             A.     **You don't want me to read it, do you?**

7             Q.     No. Your attorney gets angry if I ask for  
8     recitations.

9                     MR. ELSTER: Come on, now.

10                    THE DEPONENT: That's funny. No, it  
11     is good. It's a good way to dodge that. Maybe  
12     later, the break.

13     BY MR. SOLVERUD

14             Q.     Yes.

15                    In your email, you say, "We need to find a  
16     way to move folks over to our operations and do it  
17     systemically during December while the court case in  
18     Illinois is in flux." Did I read that correctly?

19             A.     **Yes, I believe so.**

20             Q.     What folks are you referring to in your  
21     email?

22             A.     **People who supported Phyllis Schlafly's**  
23     **vision for the country.**

24             Q.     And you say, "move them over." Move them

Edward Martin, Jr.

June 4, 2019

Page 27

1 over to where?

2 A. Well, this is just one email, but  
3 to -- after Phyllis died, we had looked -- I  
4 especially had looked long and hard at how you get  
5 people to follow when the leader is gone. And so  
6 the question was, what kinds of -- what kind of  
7 organization, what kind of direction would give  
8 people the comfort and interest to come forward and  
9 follow them. So I think that's either this was a  
10 discussion that was ongoing about how to steer  
11 people who are supporting Phyllis's vision for  
12 America, and we just won this election, and there  
13 was real sense that we needed to build on that.

14 Q. Where were you moving them from?

15 A. I'm not sure I know to say. Just in  
16 general, the response, the book Phyllis and I  
17 wrote -- The New York Times best-seller -- people  
18 were motivated about Phyllis being early. So there  
19 was lots of different -- but in a long experience,  
20 there were people who came and went into Phyllis'  
21 orbit, whether it was RNC Life, Stop ERA, and all  
22 those.

23 So it was -- in this case, it looks like  
24 we were talking about c3 work, and so it's -- it's

Edward Martin, Jr.

June 4, 2019

Page 28

1 more about the education on Phyllis and moving  
2 things forward, so I can't go back and know. If you  
3 have more documents that would refresh that, I'd be  
4 happy to look at them.

5 Q. So is it your testimony that you don't  
6 know what folks you were moving -- well, strike  
7 that.

8 You said that the folks that you're  
9 referring to are people that supported Phyllis  
10 Schlafly. I think that was your testimony, correct?

11 A. It sounds broadly correct, yes.

12 Q. Right. And he would have told me if I  
13 misstated it.

14 A. Yeah.

15 Q. And you're trying to move them. Where  
16 exactly are you moving them from, and then to what  
17 operations are you seeking to move them to?

18 A. Again, just November 26, 2016, nobody  
19 picked Trump as early as Phyllis, and that was the  
20 most, you know, historic moment. So we are saying  
21 how do we build on -- and now she's died, and, you  
22 know, she died two months earlier. How do we build  
23 on that momentum?

24 So, again, reading this in multiple

Edward Martin, Jr.

June 4, 2019

Page 29

1 paragraphs, it looks like we're talking about how to  
2 create a c3.

3 Now, when -- I think it was Mencken -- I  
4 don't know -- or Chesterton died, they created a  
5 Chesterton Society, which was more about giving  
6 people access to the writings and all. So we're  
7 trying to say, "How do we steer people that believed  
8 in Phyllis, like this woman, and give them a place  
9 to be connecting to?" And, again, I don't recall  
10 the timing, but that seems to be three weeks after  
11 the election. That seems to be what we're doing.

12 Q. And the operations that you're moving them  
13 to, is it your testimony you're trying to move them  
14 to another c3? Is that your testimony?

15 A. No, I don't think I testified to that.

16 Q. So what are you referring to when you say,  
17 "our operations"?

18 A. I'm not sure at that moment.  
19 Organizationally, the next paragraph is where -- a  
20 project of the c3. So we're trying to -- again, the  
21 context is -- I think it was Chesterton, but the  
22 context is how after someone dies, how do you get  
23 people to focus to what they're doing. Now all  
24 Trump supporters have seen Trump come to the funeral

Edward Martin, Jr.

June 4, 2019

Page 30

1 for her, and so we're trying. So I don't know where  
2 we would have put that. We didn't do it obviously,  
3 so it's a little bit vague to me.

4 Q. As you sit here today, you don't recall  
5 what the reference to "our operations" is, correct?

6 A. Well, what I recall is this is a  
7 conversation about a c3, so that's the context of  
8 this email. If you have more to show me that  
9 refreshes that it's broader. But at every point in  
10 Phyllis's work, when Phyllis was alive, there were  
11 different organizations that were fitting together,  
12 and so this would not be out of the ordinary to  
13 think, "Hey, how do we get people moving  
14 towards . . ."

15 You'll notice the copy of the Trump book,  
16 the weekly email, the Schlafly column, those are  
17 things that we were doing, trying to -- in trying to  
18 position them for people. That would be what we're  
19 doing.

20 Q. And you say, "We need to do it  
21 systemically in December while the court case in  
22 Illinois is in flux." What relevance did the court  
23 case have in trying to move folks over to your  
24 operations systemically?



Edward Martin, Jr.

June 4, 2019

Page 31

1           A.     People were just confused from the time  
2     the lawsuit was filed until after the election. So  
3     giving people clarity of -- well, okay. So giving  
4     people clarity on what were the possibilities to be  
5     connected to what Phyllis wrote and did was  
6     important.

7           Q.     And what were people confused by?

8           A.     Well, the lawsuit and the press onslaught  
9     that Mrs. Cori and the folks did. You know, that  
10    got a lot of press. People were concerned as to  
11    why. Of course, the six that sued were Cruz  
12    supporters and had been. So there was all kinds of  
13    tumult. So we were just -- you can see from the  
14    exchange, people's energy for Phyllis was so strong,  
15    but there was lots of concern about what was  
16    happening.

17          Q.     And what was significant about the court  
18    case being in flux?

19          A.     I don't recall what that was, and we had  
20    the ruling four weeks before, but I don't recall the  
21    details of what.

22          Q.     And what did you mean by "in flux"?

23          A.     I don't recall that.

24          Q.     You don't recall?

Edward Martin, Jr.

June 4, 2019

Page 32

1           **A.     Huh-uh.**

2           Q.     You write down below -- you use the  
3 reference "a/b testing."

4           **A.     Mm-hmm.**

5           Q.     What does that mean?

6           **A.     It's the -- simplified, my definition**  
7 **would be trying messaging to people to see what they**  
8 **respond to.**

9           Q.     And you had done that at the time prior to  
10 sending this email, correct?

11          **A.     Well, I don't recall the specifics, but**  
12 **that's what it says.**

13          Q.     Okay. So what a/b testing had you done?

14          **A.     To be clear, a/b testing is something**  
15 **that -- it sounds like a big term, but it's more of**  
16 **a -- when you send an email, you send it with two**  
17 **subject lines and see what responds. You're**  
18 **asking -- you're trying to see what people are**  
19 **responsive to. So it's almost -- it's a little bit**  
20 **of a term of art, but it just means listening to**  
21 **people and seeing how people react to what's**  
22 **happening.**

23          Q.     Had you sent emails as part of your a/b  
24 testing?

Edward Martin, Jr.

June 4, 2019

Page 33

1           A.    No.  I guess what I'm saying, there wasn't  
2   an a/b testing.  A/b testing is a description of how  
3   you operate.  It's a tool in your toolbox.  So  
4   every -- almost every time you do something, c3, c4  
5   anything, you're -- I'm doing that.  So I don't know  
6   what this refers to.

7           Q.    Okay.  You write, "Pound this message to  
8   our biggest lists for all of December and make this  
9   our big add for the next four weeks."  What lists  
10  are you referring to?

11          A.    Well, I assume they are -- I can't know.  
12  There's more documents that show.  It's our -- the  
13  people who are supportive of Phyllis broadly.

14          Q.    Okay.  And what lists specifically are you  
15  referring to?

16          A.    Eagle Trust maintained our lists, so we  
17  had big lists of, you know, the Phyllis' mailing  
18  lists, all the things that she maintained herself  
19  all those years.

20          Q.    When you say, "Eagle Trust," you're  
21  referring to Eagle Trust Fund?

22          A.    Correct.  Sorry.

23          Q.    And what lists did Eagle Trust Fund  
24  maintain that you're referring to here?

Edward Martin, Jr.

June 4, 2019

Page 34

1           **A. All of Phyllis' lists. Phyllis -- from**  
2           **the time she started, that was her Rolodex.**

3           Q. What were the biggest lists that you're  
4           referring to that Phyllis maintained?

5           **A. Oh, well, I'm not sure of the biggest.**  
6           **That's not -- I was not in on the lists too much.**  
7           **So I would have to defer to John or somebody about**  
8           **the specifics.**

9           Q. But you used the word, "biggest lists."  
10          And you're referring to more than one, correct?

11          **A. Well, it says, "lists." Yeah, okay.**

12          Q. And so which lists were you referring to  
13          as the biggest lists?

14          **A. I don't recall that to know.**

15          Q. And you use the word "our." Who is the  
16          "our" that you're referring to?

17          **A. I think that would have been sort of the**  
18          **Phyllis Schlafly universe. It's -- you know, we**  
19          **would -- but I'm not sure about that context, and**  
20          **I'm not sure what "our big add" means, but that may**  
21          **be a typo.**

22          Q. Okay. And this was never done, correct?

23          **A. Correct.**

24          Q. With respect to Exhibit 79, one quick

Edward Martin, Jr.

June 4, 2019

Page 35

1 question. Where Andy says, "But, John, we do need  
2 to outcompete the other side," do you agree with  
3 Andy that they needed to outcompete the other side?

4 **A. I don't think I was on that email.**

5 Q. Well, you received it.

6 **A. No, I don't think that shows that. This**  
7 **document doesn't show it.**

8 Q. Well, actually, because you received it on  
9 November 25th.

10 **A. Oh, okay.**

11 Q. Didn't you?

12 **A. It looks like that, but that's down below**  
13 **on a thread, so I don't know the context broadly.**  
14 **I'm reading it. If you want to ask me about what I**  
15 **think Andy meant.**

16 Q. Do you agree with Andy's statement that  
17 "We do need to outcompete the other side"?

18 MR. ELSTER: Objection. Vague, and  
19 speculation as to what is meant by "outcompete."

20 THE DEPONENT: I don't -- yeah, I  
21 don't know what Andy meant. I know we -- broadly  
22 all that Phyllis put us in, we worked hard to be the  
23 best that we did. We didn't worry about how  
24 much -- that term doesn't ring for me.

Edward Martin, Jr.

June 4, 2019

Page 36

1 BY MR. SOLVERUD

2 Q. So did you agree or disagree with Andy?

3 A. I don't know what he meant. I don't know  
4 what he meant.

5 Q. So you can't answer the question?

6 A. Well, I can't answer. I said, "I don't  
7 know what he meant."

8 Q. Okay. So you can't answer with a "yes" or  
9 "no"? Is that your testimony?

10 A. I can't answer what Andy thought about  
11 what he means by "outcompete." That's right. I  
12 don't know what Andy meant, so I'm not going to  
13 speculate and try to say what he means. I'm sure he  
14 has an opinion.

15 Q. Do you have an understanding as to what  
16 Andy meant by "the other side"?

17 MR. ELSTER: Same objections.

18 THE DEPONENT: It looks like he's  
19 referring to the problems with Eagle Forum, but  
20 there's a lot of pieces out there, so. And, really,  
21 I think he means the six, so.

22 BY MR. SOLVERUD

23 Q. My clients? Is that what you're talking  
24 about?

Edward Martin, Jr.

June 4, 2019

Page 37

1           **A.     The six plaintiffs?**

2           Q.     Yes.

3           **A.     Yes, yes.**

4           Q.     And did you eventually find a way to move  
5 folks over to your operations?

6           **A.     I'm not sure I have that answer clear. It**  
7 **was -- it's an ongoing process to try to draw people**  
8 **to Phyllis Schlafly's work.**

9           Q.     And what did you end up doing specifically  
10 to move folks over to your operations?

11                   MR. ELSTER: Objection. Vague as to  
12 "you."

13                   THE DEPONENT: I don't -- I think  
14 that phrase is not how -- what I would use. I'd say  
15 we continue Phyllis' work and tried to attract  
16 people to us. I don't --

17 BY MR. SOLVERUD

18           Q.     That's the phrase you used, sir.

19           **A.     At one point in an email. I'm saying that**  
20 **day to day, moving people "over to our operations"**  
21 **is not a phrase that we use. We say we do our work**  
22 **on c3. People are attracted to all of John's**  
23 **writings, my work, all these -- Phyllis' background,**  
24 **and we go forward. So that's what I think there.**

Edward Martin, Jr.

June 4, 2019

Page 38

1 But I don't know about moving over to our  
2 operations.

3 Q. So is it your testimony, sir, that you  
4 can't or don't know what, if anything, you've done  
5 to move folks over to your operations?

6 MR. ELSTER: Objection. Vague as to  
7 "you."

8 THE DEPONENT: That phrase is not one  
9 that I say we use or that I use regularly, but  
10 I -- again, in the context when it was written,  
11 November of 2016, the idea was how do we get people  
12 to come towards our organization with our founder  
13 gone and the Trump victory, and so there's a lot of  
14 pieces there, but if you have more for me to look  
15 at, I'd be happy to do it.

16 (Plaintiff's Exhibit 81 was marked for  
17 identification.)

18 BY MR. SOLVERUD

19 Q. Let me show you a document marked  
20 Exhibit 81. Let me know after you've read it.

21 A. Okay.

22 Q. Before we talk about Exhibit 81, are you  
23 aware of any effort to move donors or supporters  
24 from Eagle Forum to Phyllis Schlafly's American



Edward Martin, Jr.

June 4, 2019

Page 39

1 Eagles at any time?

2 **A. I'm not sure what that means.**

3 Q. Okay.

4 MR. ELSTER: Objection. Compound.

5 THE DEPONENT: Not that I recall, no.

6 I mean, I don't know what that -- it's a little

7 vague for me, but not that I recall right now.

8 BY MR. SOLVERUD

9 Q. So do you recall in December of 2016 that  
10 an individual named Ian Northon was spending time  
11 trying to recover or obtain control over the Eagle  
12 Forum website?

13 MR. ELSTER: Objection. Form.  
14 Vague, compound.

15 THE DEPONENT: Answer?

16 I don't recall Ian working on the  
17 website, but I know that was a concern at that time

18 BY MR. SOLVERUD

19 Q. Okay.

20 **A. At that period of time, the website was a**  
21 **concern.**

22 Q. So you're familiar with Bruce Schlafly,  
23 correct?

24 **A. Uh-huh.**

Edward Martin, Jr.

June 4, 2019

Page 40

1 Q. Tell me who Bruce Schlafly is.

2 A. One of Phyllis' sons.

3 Q. He's a doctor, correct?

4 A. He is a physician, yes.

5 Q. And he's a smart guy; is that right?

6 A. He is a smart guy, sure. All the Schlafly  
7 children are smart.

8 Q. He's responsible for helping you get  
9 elected in 2015?

10 MR. ELSTER: Objection. Form.

11 THE DEPONENT: A lot of people were  
12 helpful in getting me elected. That's right.

13 BY MR. SOLVERUD

14 Q. Okay. But Bruce Schlafly was somebody  
15 that you worked specifically with as part of your  
16 efforts to get appointed by Phyllis Schlafly as her  
17 successor?

18 MR. ELSTER: Object to form and  
19 foundation.

20 THE DEPONENT: I wouldn't  
21 characterize it that way.

22 BY MR. SOLVERUD

23 Q. Okay. Have you ever known Bruce Schlafly  
24 to misrepresent any facts?

Edward Martin, Jr.

June 4, 2019

Page 41

1           **A.     I don't think so, no.**

2           Q.     Okay. And Bruce Schlafly was  
3 familiar -- to your knowledge, Bruce Schlafly was  
4 familiar with the organizations that his mother had  
5 created, correct?

6                     MR. ELSTER: Object to the extent it  
7 calls for speculation.

8                     THE DEPONENT: I think Bruce Schlafly  
9 was involved in the last years of her life. I'm not  
10 sure -- when you say, "familiar with the  
11 organizations," she started creating organizations  
12 in the '50s.

13 BY MR. SOLVERUD

14           Q.     Right.

15           **A.     So most people, other than John and a few**  
16 **others, would not know as much about that, including**  
17 **even her sons.**

18           Q.     But at least as of beginning in 2015  
19 moving forward?

20           **A.     Sure.**

21           Q.     Is it fair to say Bruce Schlafly was  
22 familiar with and involved in the organizations that  
23 Phyllis Schlafly was involved in?

24                     MR. ELSTER: Object. Compound.

Edward Martin, Jr.

June 4, 2019

Page 42

1 THE DEPONENT: Sorry.

2 "Familiar with" is more accurate,  
3 but, yeah, okay.

4 BY MR. SOLVERUD

5 Q. And Bruce Schlafly was involved in  
6 discussions related to the formation of Phyllis  
7 Schlafly's American Eagles, correct?

8 A. I think so.

9 Q. Yeah. Bruce Schlafly was not a member of  
10 Phyllis Schlafly's American Eagles? Not a director,  
11 correct?

12 A. Correct.

13 Q. On December 15, 2016, Bruce Schlafly  
14 writes in an email that "We are in competition with  
15 another conservative organization. There is very  
16 little ideological difference." Do you see that?

17 A. What? What page?

18 Q. It's the second page about halfway down.

19 A. Uh-huh.

20 Q. And do you agree with Mr. Schlafly's  
21 statement that "We're in competition with another  
22 conservative organization. There is very little  
23 ideological difference"?

24 MR. ELSTER: Objection to the extent

Edward Martin, Jr.

June 4, 2019

Page 43

1 it calls for speculation or legal conclusion.

2 THE DEPONENT: I'm not sure which  
3 organizations he's talking to, so I'm not sure to be  
4 clear. I'm not a hundred percent what he's saying  
5 there.

6 BY MR. SOLVERUD

7 Q. He says, "You win this competition not by  
8 publicly trashing them, but by offering a better  
9 product and concentrating on the nuts and bolts of  
10 running a business." Did I read that correctly?

11 A. Yes.

12 Q. And do you agree with that statement?

13 MR. ELSTER: Objection. Speculation.

14 THE DEPONENT: Do I agree with that  
15 statement? He said that statement. I think he's  
16 making his opinion. We certainly -- I certainly  
17 agree that you have to run an organization well to  
18 succeed.

19 BY MR. SOLVERUD

20 Q. Isn't it true that in December of 2016,  
21 Phyllis Schlafly's American Eagles was in  
22 competition with Eagle Forum?

23 MR. ELSTER: Objection. Form,  
24 foundation. Calls for a legal conclusion.

Edward Martin, Jr.

June 4, 2019

Page 44

1 THE DEPONENT: Phyllis Schlafly's  
2 American Eagles began in May, and all summer and  
3 into that fall we were doing what Phyllis had told  
4 us to do.

5 So when you say, "competition," if  
6 you mean there's other groups in the country,  
7 including Eagle Forum, that have, you know, an  
8 interest in being in that space to compete, if  
9 that's what you mean or he means, then -- but what  
10 we knew was we had to make the voices that Phyllis  
11 wanted heard in that key time, and that's what we  
12 were doing.

13 So there were lots -- there's lots of  
14 groups out there that might say, "Hey, we think  
15 we're competing with them," and people may describe  
16 that, but that's we did to further her voice, her  
17 vision.

18 BY MR. SOLVERUD

19 Q. And isn't it true that as of December of  
20 2016, there was very little ideological difference  
21 between Phyllis Schlafly's American Eagle and Eagle  
22 Forum?

23 MR. ELSTER: Object to the extent it  
24 calls for speculation.

Edward Martin, Jr.

June 4, 2019

Page 45

1 THE DEPONENT: Well, I disagree with  
2 that, and that's not Bruce -- Bruce is a doctor and  
3 a board member, and so I just disagree that there's  
4 not a difference there.

5 BY MR. SOLVERUD

6 Q. Okay. If you go to the first page of  
7 Exhibit 81, Bruce says that, "I, as trustee of Eagle  
8 Trust Fund, am going to be in competition with the  
9 Cori EF for a long, long time, and nothing Ian does  
10 is going to change that." Did you ever understand  
11 there to be a competition between the Eagle Trust  
12 Fund and Eagle Forum?

13 A. I'm sorry. I missed where you were  
14 quoting, his email.

15 Q. First line.

16 A. I'm sorry. Down at the bottom. I didn't  
17 see it. I was looking for it up here. Tell me  
18 again what quote.

19 Q. Did you understand that by 2016, Eagle  
20 Trust Fund was in competition with Eagle Forum?

21 A. I did not.

22 Q. Okay. At any point in time are you aware  
23 of any competition between Eagle Forum and Eagle  
24 Trust Fund?

Edward Martin, Jr.

June 4, 2019

Page 46

1           **A.     I did not consider that to be happening.**

2           Q.     And then at the top of Exhibit 81, Roger  
3     Schlafly provides his opinion, and he says to Bruce,  
4     "I agree about outcompeting Cori EF, but is not that  
5     simple. PS American Eagles was formed for the  
6     purpose of competing, and it got sued also." Did I  
7     read that correctly?

8           **A.     Yes.**

9           Q.     Isn't it true that Phyllis Schlafly's  
10    American Eagles was formed for the purpose of  
11    competing with Eagle Forum?

12                   MR. ELSTER: Objection. Form,  
13    foundation. Calls for speculation as to what Roger  
14    meant.

15                   THE DEPONENT: It is not true.  
16    BY MR. SOLVERUD

17           Q.     It's not true? So Roger is just dead  
18    wrong on that?

19                   MR. ELSTER: Same objections.

20                   THE DEPONENT: You asked me if it's  
21    true, and I said it's not true. Roger may  
22    have -- he goes on for a lot of words, but that is  
23    not true.

24    / / /



Edward Martin, Jr.

June 4, 2019

Page 47

1 BY MR. SOLVERUD

2 Q. And has never been true, correct?

3 MR. ELSTER: Same objections.

4 THE DEPONENT: The sentence is, "was  
5 formed for the purpose of competing." That is not  
6 true. It can't -- yeah.

7 BY MR. SOLVERUD

8 Q. Does Phyllis Schlafly's American Eagles  
9 assert any right as an owner or licensee in the  
10 Eagle Forum trademark?

11 MR. ELSTER: Objection. Compound,  
12 and to the extent it calls for a legal conclusion.

13 THE DEPONENT: I don't know the  
14 answer to that.

15 BY MR. SOLVERUD

16 Q. Does Phyllis Schlafly's American Eagles  
17 own any licenses?

18 MR. ELSTER: Same objections.

19 THE DEPONENT: I don't know that at  
20 this moment. There's -- part of me thinks there may  
21 be some, but I don't have that in my recollection  
22 right now.

23 BY MR. SOLVERUD

24 Q. Who would know?

Edward Martin, Jr.

June 4, 2019

Page 48

1           A.     I'm not sure.   Probably John and I -- or  
2     John.   There may be -- I'm not sure what that means,  
3     "licensing," so I don't know if there's something  
4     I'm missing.

5           Q.     Are you aware of any license agreements  
6     that Phyllis Schlafly's American Eagles have ever  
7     entered into?

8           A.     I guess I -- I don't think so.   I don't  
9     know for sure.

10          Q.     Have you, as either president or member of  
11     the board of directors, ever approved entering into  
12     any licensing agreements on behalf of Phyllis  
13     Schlafly's American Eagles?

14          A.     I'm not sure I know what "licensing  
15     agreements" means in that context, so I don't know.  
16     I'm not sure how to answer that.   That's what's got  
17     me pausing.

18          Q.     Okay.   Have you either as president or  
19     part of the directors of Eagle Forum ever authorized  
20     Phyllis Schlafly's American Eagles to enter into any  
21     written agreement?

22          A.     Written agreement of any kind or licensing  
23     agreement?

24          Q.     Written agreement.

Edward Martin, Jr.

June 4, 2019

Page 49

1           A.     Again, I'm not sure what that -- we've  
2     done some things for mailing. I don't know if  
3     that's a written agreement or not. So I'd have  
4     to -- I'm not sure. I'm not sure I recall right  
5     now.

6           Q.     Okay. Does Phyllis Schlafly's American  
7     Eagles assert any rights as an owner or licensee in  
8     the Eagle logo trademark?

9           A.     I don't know the answer to that.

10          Q.     Do you know whether Phyllis Schlafly's  
11     American Eagles has a license for the Eagle logo  
12     trademark?

13                   MR. ELSTER: Objection to the extent  
14     it calls for a legal conclusion.

15                   THE DEPONENT: I don't, but,  
16     remember, Phyllis was alive when Phyllis Schlafly  
17     American Eagles was started, so that was the  
18     context. She would have been the person in the  
19     context to approve that or make that happen. So the  
20     founding was intentionally, happily, before she  
21     died.

22     BY MR. SOLVERUD

23          Q.     Phyllis Schlafly was never an officer of  
24     Phyllis Schlafly American Eagles, correct?

Edward Martin, Jr.

June 4, 2019

Page 50

1           A.    I don't know that answer. I'm not sure if  
2 she was either briefly on the board or not, but she  
3 was our -- we call her a "founder" of that.

4           Q.    Listen carefully, because I didn't ask  
5 about a member of the board. I asked about an  
6 officer, and we can -- we'll talk about both, but  
7 Phyllis Schlafly was never an officer of Phyllis  
8 Schlafly's American Eagles, correct?

9           A.    I'm not sure I recall. My same answer.  
10 She may have been for a brief time. I'm not sure.  
11 But we would have identified her as the founder of  
12 the organization, as she had done multiple times  
13 with other things. She was the one who, you know,  
14 got us started and approved it and gave us a  
15 mission. So that's -- that's how that related. In  
16 other places, too.

17          Q.    The articles of organization and or bylaws  
18 of Phyllis Schlafly's American Eagles did not create  
19 any officer position for founder; isn't that right?

20          A.    I don't recall.

21               MR. ELSTER: Objection to the extent  
22 it calls for a legal conclusion.

23               THE DEPONENT: I don't recall those  
24 documents, but that would have been the practical

Edward Martin, Jr.

June 4, 2019

Page 51

1 way we were operating.

2 BY MR. SOLVERUD

3 Q. The only officers of Phyllis Schlafly's  
4 American Eagles are you as president and Ray Wotring  
5 as a secretary; isn't that right?

6 A. Currently?

7 Q. Yeah.

8 A. I don't think currently that's right, but  
9 I'm not sure.

10 Q. Okay. Well, let's talk about when it was  
11 formed. When it was formed, Phyllis Schlafly's  
12 American Eagles only had two officers? You as  
13 president and Ray Wotring as secretary, correct?

14 A. I'm not -- I don't remember that  
15 specifically, but it sounds right.

16 Q. Okay. And are you aware of any changes to  
17 the officers of Phyllis Schlafly's American Eagles  
18 at any time since its creation?

19 A. I think Ray was replaced, but I don't know  
20 if that -- maybe I'm not recalling.

21 Q. Who was he replaced by?

22 A. I'm not sure I know the answer. I'd have  
23 to review those documents.

24 Q. When was he replaced?

Edward Martin, Jr.

June 4, 2019

Page 52

1           **A.     I don't recall right now.**

2           Q.     And who would have those documents?

3           **A.     I think we would have them, I would have**  
4 **them, or maybe John would have them.**

5           Q.     When you say, "We would have them" --

6           **A.     My office, you know.**

7           Q.     Are you talking about Phyllis Schlafly's  
8 American Eagles office?

9           **A.     Well, you asked who would have them. I**  
10 **would have them. Me or John, I suppose.**

11          Q.     Okay. Does Phyllis Schlafly's American  
12 Eagles assert any rights as an owner or licensee to  
13 the Eagle pin trademark?

14                   MR. ELSTER: Objection. Compound.

15                   THE DEPONENT: I'm not sure that  
16 I -- I don't think so, but I'm not sure I know the  
17 answer.

18 BY MR. SOLVERUD

19          Q.     Does Phyllis Schlafly's American Eagles  
20 have a license to the Eagle pin trademark?

21                   MR. ELSTER: Objection to the extent  
22 it calls for a legal conclusion.

23                   THE DEPONENT: Again, Phyllis was  
24 alive when we started. So if there was a license,

Edward Martin, Jr.

June 4, 2019

Page 53

1 it would have been at that time, and I don't know  
2 the answer.

3 BY MR. SOLVERUD

4 Q. Does Phyllis Schlafly's American Eagles  
5 assert any rights as an owner or licensee in the  
6 Eagle Forum PAC trademark?

7 MR. ELSTER: Objection. Compound.

8 THE DEPONENT: Same. My answer would  
9 be when Phyllis was alive and founded the  
10 organization, she would have been the one who made  
11 those calls. That was how we always operated, so I  
12 don't know the answer as we sit here now.

13 BY MR. SOLVERUD

14 Q. Does Phyllis Schlafly American Eagles have  
15 a license in the Eagle Forum trademark?

16 MR. ELSTER: Objection. Legal  
17 conclusion.

18 THE DEPONENT: Same answer.

19 BY MR. SOLVERUD

20 Q. Does Phyllis Schlafly's American Eagles  
21 assert any rights as an owner or licensee in the  
22 Eagle trademark?

23 MR. ELSTER: Objection. Compound.

24 THE DEPONENT: Same answer. I'm not

Edward Martin, Jr.

June 4, 2019

Page 54

1 sure. I'm not sure I know definitively, but, again,  
2 Phyllis was alive at our founding when those kinds  
3 of things would have been sort of operational.

4 BY MR. SOLVERUD

5 Q. Do you have any knowledge about who owns  
6 Phyllis' name, image, and likeness?

7 MR. ELSTER: Objection to the extent  
8 it calls for a legal conclusion, and vague as to  
9 name, image, and likeness.

10 THE DEPONENT: Only in so far as  
11 before she died, she cared about that. So she made  
12 decisions about that, and I don't know.

13 BY MR. SOLVERUD

14 Q. Do you have any knowledge about who owns  
15 or controls Phyllis' name, image, and likeness since  
16 her passing?

17 MR. ELSTER: Same objection. Vague  
18 as to "control."

19 THE DEPONENT: I'm not sure I know  
20 the answer.

21 BY MR. SOLVERUD

22 Q. I'm just trying to figure out if you have  
23 knowledge or not.

24 A. Yeah, I'm not sure I know the answer.



Edward Martin, Jr.

June 4, 2019

Page 55

1 Q. Does Phyllis Schlafly's American Eagles  
2 have any rights to use Phyllis' name, image, or  
3 likeness?

4 MR. ELSTER: Objection. Legal  
5 conclusion, and vague.

6 THE DEPONENT: Well, when she -- when  
7 we founded it, she obviously gave permission so that  
8 we're operating under that.

9 BY MR. SOLVERUD

10 Q. And is there any writing that demonstrates  
11 her giving permission?

12 A. I'm not sure I know.

13 Q. You're not aware of any?

14 A. I'm not sure I know. Right now sitting  
15 here, I don't recall that, but if there's documents  
16 that exist, I could be refreshed on that.

17 Q. Are you aware of any licenses regarding  
18 Phyllis Schlafly's name, image, and likeness?

19 MR. ELSTER: Objection to the extent  
20 it calls for a legal conclusion.

21 THE DEPONENT: Yeah. I know that  
22 Phyllis allowed and made clear who could use her  
23 name and image and likeness, and that was something  
24 that she was protective of, and when she was alive,

Edward Martin, Jr.

June 4, 2019

Page 56

1 she was very clear she was in charge. In fact, she  
2 took away from your clients the right to use her  
3 name and all that specifically before she died. So  
4 that was -- that's the awareness of it. That  
5 wasn't -- broadly, that wasn't -- licensing, it  
6 wasn't something that I was involved in.

7 BY MR. SOLVERUD

8 Q. Does Phyllis Schlafly's American Eagles  
9 have any documents regarding any license to use  
10 Phyllis Schlafly's name, image, and likeness?

11 MR. ELSTER: Object to the extent it  
12 calls for privileged, attorney-client privileged  
13 documents to the extent there's communications  
14 between counsel.

15 THE DEPONENT: When -- at our  
16 founding, Phyllis was happy to have us proceed that  
17 way, so that's the best knowledge I have right now.

18 BY MR. SOLVERUD

19 Q. So you don't have any documents? I'm just  
20 asking whether you're aware of any documents.

21 MR. ELSTER: Same objection.

22 THE DEPONENT: I'm not aware as we  
23 sit here.

24 / / /

Edward Martin, Jr.

June 4, 2019

Page 57

1 BY MR. SOLVERUD

2 Q. Okay. Does Phyllis Schlafly American  
3 Eagles own any intellectual property?

4 MR. ELSTER: Objection. Vague as to  
5 intellectual property. Legal conclusion.

6 THE DEPONENT: I'm not sure I know  
7 what you mean by that.

8 BY MR. SOLVERUD

9 Q. I mean, is it your testimony you don't  
10 understand what the word "intellectual property" --

11 A. In this context, I'm not sure what that  
12 means here. Is it -- so can you clarify?

13 Q. Well, does Phyllis Schlafly's American  
14 Eagles own any property?

15 A. Has some finances and has some donors  
16 probably that have been given to it, but other than  
17 that, I'm not sure whether you count the licenses or  
18 whatever Phyllis granted to the organization while  
19 she was alive in terms of the use of the name. I'm  
20 not how you characterize that. The follow-on of  
21 those questions is making me think of those issues,  
22 so I'm not sure if that's helpful.

23 Q. Does Phyllis Schlafly American Eagles own  
24 any tangible property?

Edward Martin, Jr.

June 4, 2019

Page 58

1           **A.    I'm not sure I know the answer. I don't**  
2           **think so.**

3           **Q.    Okay. It doesn't own any real property;**  
4           **is that right?**

5           **A.    That's correct.**

6           **Q.    Does it have any bank accounts?**

7           **A.    It does have bank accounts, yeah.**

8           **Q.    Where are the bank accounts?**

9           **A.    Oh, I'd have to check on that. In my**  
10          **mind, there's a couple of them there. One of them,**  
11          **I think, is in Virginia.**

12          **Q.    At the BB&T?**

13          **A.    I think so. Yeah, that's right. BB&T is**  
14          **PSAE.**

15          **Q.    And are you aware of any other bank**  
16          **accounts maintained by Phyllis Schlafly's American**  
17          **Eagles?**

18          **A.    I'm not sure, but I think there's at**  
19          **least -- there's probably one other, but I'm not**  
20          **sure.**

21          **Q.    Who controls access to the BB&T bank**  
22          **accounts?**

23          **A.    Well, John is sort of treasurer, and I**  
24          **think probably at some point I had access. Although**

Edward Martin, Jr.

June 4, 2019

Page 59

1 BB&T has a terrible procedure for working with them,  
2 but . . .

3 Q. As you sit here today, who has access to  
4 the BB&T bank account?

5 A. I think John. I'm not sure that I do, but  
6 John. It would be either John and I, or just John.

7 Q. You just testified that John was  
8 treasurer. Is it your testimony John Schlafly is  
9 treasurer of Phyllis Schlafly's American Eagles?

10 A. I don't know if he's got that title, but  
11 he plays a role that's -- his specialty is  
12 understanding how to work with all these different  
13 entities, and so that's one of the ways he gets  
14 referred to, I suppose, but I don't remember if we  
15 put that in a formal -- he's on that board, I  
16 believe, PSAE. So he plays that role to assist.

17 Q. Do you know whether John Schlafly has ever  
18 served as an officer of Phyllis Schlafly's American  
19 Eagles?

20 A. Not as we sit here right now.

21 Q. Other than the BB&T bank account, you said  
22 that there may be another bank account. Do you know  
23 where the other bank account is?

24 A. I think it's in Missouri. I think we

Edward Martin, Jr.

June 4, 2019

Page 60

1 maybe have a US Bank, or maybe it's in Alton. I'm  
2 not sure. We had trouble with having one in  
3 Virginia, so I'm not sure what we did.

4 Q. How is the BB&T bank account used? What  
5 is deposited into that account?

6 A. I'm not sure what you mean. If we've  
7 gotten contributions, they go there, and --

8 Q. Are you done?

9 A. Go ahead.

10 Q. Is there any certain types of items that  
11 get deposited in the BB&T bank account as opposed to  
12 the US Bank account?

13 A. No. That was a convenient thing. It was  
14 a problem of being in different parts of the nation,  
15 and so . . .

16 Q. What's the current balance in the BB&T  
17 bank?

18 A. I don't know sitting here today.

19 Q. And would that be something that I'd have  
20 to ask John Schlafly if I wanted to know?

21 A. It would be better to ask him.

22 Q. Right. And is that the same with the US  
23 Bank account?

24 A. Correct.

Edward Martin, Jr.

June 4, 2019

Page 61

1 Q. Are you aware of any investment income  
2 generated by Phyllis Schlafly's American Eagles?

3 **A. I'm not aware of that.**

4 Q. Are you aware of any investments that  
5 Phyllis Schlafly's American Eagles has?

6 **A. I'm not aware of that.**

7 Q. Does it own any leases?

8 **A. I don't believe so.**

9 Q. And I think we -- I think you said it  
10 doesn't own any real property, correct?

11 **A. Correct.**

12 Q. Does it have -- other than I think you  
13 said, "finances," in which I take to mean whatever  
14 is in the BB&T account or US Bank account, are you  
15 aware of any other property, tangible or intangible,  
16 that PSAE owns?

17 **A. Well, we had made logos and letterhead and**  
18 **things like that. So I think there would be that.**  
19 **Of course, we would have donors to PSAE that would**  
20 **be -- I don't know if that's property, but there**  
21 **would be known people who had supported PSAE.**

22 Q. Does PSAE own any lists?

23 MR. ELSTER: Objection to the extent  
24 it calls for a legal conclusion.

Edward Martin, Jr.

June 4, 2019

Page 62

1 THE DEPONENT: You know, the  
2 description from the beginning is that we -- when we  
3 create -- when we end up with a list like donors to  
4 PSAE, that's always been maintained by Eagle Trust.  
5 That's our sort of back -- you know, Phyllis' design  
6 that way.

7 So we leased some lists, lists of  
8 PSAE, I think. I think it was a lease. It could  
9 have been -- yeah, it was a lease probably. And so  
10 now we have -- probably have some donors to it, but  
11 that's -- that would be -- whether that's a list  
12 itself or owned as a list, it would be different  
13 kind of question for John.

14 BY MR. SOLVERUD

15 Q. Well, who owns the lists that you leased?

16 MR. ELSTER: Same objection.

17 THE DEPONENT: Who owns the lists  
18 that we leased? I don't know.

19 BY MR. SOLVERUD

20 Q. And, you know, you're familiar with the  
21 phrase "caging"?

22 A. Uh-huh.

23 Q. You understand that's a process that if  
24 you either lease or maintain a list, you, you know,



Edward Martin, Jr.

June 4, 2019

Page 63

1 constantly update the list to keep the information  
2 fresh and to drop out people that may not be  
3 relevant anymore, things of that nature? You're  
4 familiar with that concept of caging?

5 **A. That's not caging.**

6 Q. Okay. What is your understanding of the  
7 word "caging"?

8 **A. Caging is when you get donations in.**  
9 **Someone maintains it for you.**

10 Q. Okay.

11 **A. So a lot of times people will pay a**  
12 **service, outside vendors, a lot of money to bring in**  
13 **when you get donations in, and then they manage it**  
14 **and take a percentage.**

15 Q. Has PSAE ever engaged in caging?

16 **A. Engaged in caging?**

17 Q. Meaning hired somebody to --

18 **A. I don't recall that. I'm not sure if they**  
19 **did or didn't.**

20 Q. Has PSAE ever paid any money for caging?

21 **A. With regard to our mail, I'm not sure**  
22 **right now as we sit here.**

23 Q. How much money has PSAE earned since its  
24 creation?

Edward Martin, Jr.

June 4, 2019

Page 64

1           **A. I don't have that number offhand.**

2           Q. Do you have access to that information?

3           **A. I probably -- I think so. I mean, I could**  
4 **find it, yeah.**

5           Q. How would you go about finding?

6           **A. Talking to John.**

7           Q. Uh-huh. Are you aware of any reports that  
8 exist regarding revenue created by PSAE?

9           **A. I'm aware that reports were required. I'm**  
10 **not aware of those reports right now.**

11          Q. And have you seen any reports that reflect  
12 revenue raised by PSAE?

13          **A. I don't recall that, but could have been.**

14          Q. Okay. You talked about donors to PSAE.  
15 Who are the donors?

16          **A. I'm not sure of their names. I know**  
17 **people that would be responsive to that vision.**

18          Q. How many donors are there?

19          **A. I don't know the answer.**

20          Q. Is there a list of donors?

21          **A. I suspect there's a way to tell who the**  
22 **donors are, yes.**

23          Q. And how would you go about finding that  
24 out?

Edward Martin, Jr.

June 4, 2019

Page 65

1           **A.     I would talk to John.**

2           Q.     And do you know who maintains a database  
3 of the donors?

4           **A.     Well, my expectation is it's maintained by**  
5 **Eagle Trust, yes.**

6           Q.     Is there a name for the database?

7           **A.     Not that I know of.**

8           Q.     Does Phyllis Schlafly's American Eagles  
9 currently have access to any lists of its donors?

10          **A.     I'm sorry?**

11          Q.     Does Phyllis Schlafly's American Eagles  
12 currently have access to any lists of its donors?

13          **A.     I think so, yeah. I mean through John.**

14          Q.     Through John? When you say, "John," do  
15 you mean John Schlafly as the quote, unquote  
16 "treasurer"? John Schlafly as the director or John  
17 Schlafly in some other capacity?

18          **A.     Well, I mean, at the founding of PSAE,**  
19 **Phyllis' expression was this is the way we're going**  
20 **to operate, and the way for this to go forward was**  
21 **that -- you know, John is the guy who can help with**  
22 **this. So that's what I mean. So John**  
23 **Schlafly -- it matters less if I -- to say what the**  
24 **title is, but as to what Phyllis' desire when we**

Edward Martin, Jr.

June 4, 2019

Page 66

1     **started PSAE, that was the expectation, and we still**  
2     **honor that today.**

3           Q.     Who maintains the logos and the letterhead  
4     for Phyllis Schlafly's American Eagles?

5           A.     **Who maintains them?**

6           Q.     Yeah.

7           A.     **I'm not sure what that means.**

8           Q.     There's a letterhead. There's tangible  
9     pieces of paper.

10          A.     **Uh-huh.**

11          Q.     Right?

12          A.     **Yes.**

13          Q.     Where are they kept?

14          A.     **I'm not sure if they're kept in Alton or**  
15     **if some are kept in St. Louis. You know, again,**  
16     **when Phyllis was alive, if you went into her, like,**  
17     **office, extended office, you'd find a letterhead for**  
18     **decades back on all her organizations for ease of**  
19     **that. So it was sort of -- but it could be in**  
20     **Alton. I'm not sure.**

21          Q.     Does Phyllis Schlafly's American Eagles  
22     have an office?

23          A.     **No.**

24          Q.     Has it ever had an office?

Edward Martin, Jr.

June 4, 2019

Page 67

1           **A.     No.**

2           Q.     Does it have employees?

3           **A.     Not presently.**

4           Q.     Has it ever had employees?

5           **A.     No.**

6           Q.     When you say, "not presently" --

7           **A.     Well, we've had -- at various times, we've**  
8 **had people that have been working with us, and we've**  
9 **had to -- so I don't think we've ever had employees**  
10 **actually.**

11          Q.     Has Phyllis Schlafly's American Eagles  
12 ever entered into agreements with any independent  
13 contractors?

14          **A.     Yes.**

15          Q.     Who?

16          **A.     I don't remember that list right now.**

17          Q.     As you sit here today, are you able to  
18 identify a single individual that was an independent  
19 contractor for Phyllis Schlafly's American Eagles?

20          **A.     I can't be sure which -- who would have**  
21 **been involved. I'd have to look that up. If you**  
22 **want to refresh my recollection, I can --**

23          Q.     Well, what documents would I need to show  
24 you to refresh your recollection?

Edward Martin, Jr.

June 4, 2019

Page 68

1           A.    I don't know. I just -- you're asking a  
2           question. That's my -- I don't know. Right now,  
3           I'd be trying to think of who, and I don't have a  
4           sense of that.

5           Q.    You're familiar with the concept of a  
6           1099?

7           A.    Uh-huh.

8           Q.    What's your understanding of what a 1099  
9           is?

10          A.    What people get when they're independent  
11          contractors.

12          Q.    And do you know who prepares 1099s for  
13          PSAE?

14          A.    I think John does, but I'm not sure.

15          Q.    Are you aware of any individuals or  
16          entities that have provided services to Phyllis  
17          Schlafly's American Eagles?

18          A.    Again, I'm not sure what those  
19          organizations are as I sit here, or how to  
20          characterize them. I'm not sure if on the mailing,  
21          if we had that, if that was a 1099. I'm not sure if  
22          on some of the other things we did, if we did it as  
23          a 1099. I'm just not clear right now.

24          Q.    Who does Phyllis Schlafly's American

Edward Martin, Jr.

June 4, 2019

Page 69

1 Eagles' accounting work?

2 **A. Outside accounting?**

3 Q. Yeah.

4 **A. I think that would be a question for John.**

5 **I forget the name of the firm.**

6 Q. Who does their inside accounting?

7 **A. I think that's a question for John.**

8 Q. Does Phyllis Schlafly's American Eagles  
9 pay any fees to any organizations like Eagle Trust  
10 Fund or Eagle Forum Education and Legal Defense  
11 Fund?

12 **A. I'm not sure that there's been fees or if**  
13 **there's a standard fee. I don't know the answer to**  
14 **that.**

15 Q. So you don't know if they pay fees or not?

16 **A. I don't know that.**

17 Q. Are you aware of any business dealings  
18 between Phyllis Schlafly's American Eagles, and  
19 Eagle Forum Education and Legal Defense Fund?

20 **A. Yes. At least -- again, you'll have to**  
21 **refresh me, but, yes, at various times we've tried**  
22 **to figure out if things can be done together.**

23 Q. What things has EFELDF -- you understand  
24 what I mean by "EFELDF"?

Edward Martin, Jr.

June 4, 2019

Page 70

1           **A.     Yep.**

2           Q.     What things has EFELDF done with Phyllis  
3     Schlafly's American Eagles?

4           **A.     Well, finding ways to work together.   So**  
5     **there's been lots of ideas on that.   So, again --**

6           Q.     I'm not asking about the ideas.   I'm  
7     asking about things that you've actually executed  
8     on.

9           **A.     I'm not sure what -- how to answer that.**

10          Q.     Well, as you sit here today, are you able  
11     to identify any projects or activities that EFELDF  
12     and Phyllis Schlafly's American Eagles have worked  
13     on together?

14          **A.     I'm not sure how to describe whether they**  
15     **worked together or not on some of those projects**  
16     **that were going on and efforts.   So I don't know the**  
17     **answer.**

18          Q.     Are you aware of any business dealings or  
19     projects that PSAE and Eagle Trust Fund have worked  
20     on together?

21          **A.     Again, same thing.   I'm not sure I**  
22     **remember how.   We had a lot of ideas on how to move**  
23     **forward and a lot of steps, and I'm just not sure**  
24     **what -- how to answer that.**



Edward Martin, Jr.

June 4, 2019

Page 71

1 Q. There's been reference to an organization  
2 called "Phyllis Schlafly's Eagles."

3 A. Uh-huh.

4 Q. Which is not -- it's, I guess, an  
5 unincorporated association. Is that generally your  
6 understanding?

7 A. Yes, sir.

8 Q. And has Phyllis Schlafly's Eagles ever  
9 done any work with Phyllis Schlafly's American  
10 Eagles?

11 A. Well, Phyllis Schlafly's Eagles, as you  
12 said, an unincorporated association under which  
13 everybody -- a lot of our people come together. So  
14 I don't think you'd say that they work together, but  
15 we certainly are going in the same -- this is the  
16 set of people who believe in what Phyllis' vision  
17 was, and so there's lots of people that come under  
18 that umbrella.

19 Q. Have there ever been any transfers of  
20 money payments sent or received between Phyllis  
21 Schlafly's American Eagles and Phyllis Schlafly's  
22 Eagles?

23 A. I don't know that right now.

24 Q. Is there a record that you would need to

Edward Martin, Jr.

June 4, 2019

Page 72

1 consult to try to determine whether that's the case?

2 A. Sure. I mean, but I don't know what --

3 Q. What record?

4 A. I'd talk to John and look at what we've  
5 done. I'm not sure how -- I'm not sure from PSAE to  
6 Phyllis Schlafly's Eagles, but that's how we're set  
7 up.

8 Q. Are you aware of any financial  
9 transactions, payments sent or received between  
10 Phyllis Schlafly's American Eagles and Eagle Trust  
11 Fund?

12 A. Not as we sit here, no.

13 Q. Have you ever seen a financial statement  
14 for Phyllis Schlafly's American Eagles?

15 A. I don't know the answer to that. I think  
16 we've reviewed them. I've reviewed them, but I  
17 don't know if I've seen a financial statement.

18 Q. Have you ever seen any monthly P & Ls for  
19 Phyllis Schlafly's American Eagles?

20 A. No.

21 Q. Have you ever seen any sort of monthly  
22 financial statement or record prepared by John  
23 Schlafly or somebody else regarding the finances or  
24 revenue of Phyllis Schlafly's American Eagles?

Edward Martin, Jr.

June 4, 2019

Page 73

1           A.    I'm not sure monthly, but there's been  
2   some of that reporting, but I'm not sure monthly,  
3   no.

4           Q.    Are you aware of any financial  
5   transactions, payments sent or received between  
6   Phyllis Schlafly's American Eagles and EFELDF?

7           A.    Again, we have -- and I'd have to refresh  
8   myself. We've had a number of different times where  
9   we've done -- contemplated some things, some big or  
10   some small, or some ideas. And as we sit here now,  
11   I can't describe well, my memory, on what we finally  
12   have done. So I'd have to refresh that and look at  
13   the documents.

14                   MR. SOLVERUD:   Why don't we take a  
15   quick break.

16                   THE VIDEOGRAPHER:   We're off the  
17   record at 10:11 a.m.

18                   (Whereby a short break was taken.)

19                   THE VIDEOGRAPHER:   We're back on the  
20   record at 10:28 a.m.

21                   (Exhibit 43, previously marked, was  
22   identified for the record.)

23   BY MR. SOLVERUD

24           Q.    I'm going to show you a document that's

Edward Martin, Jr.

June 4, 2019

Page 74

1 been marked as Exhibit 43 in a prior deposition.

2 These don't have stamps on them.

3 **A. Okay.**

4 Q. Tell me after you've had a chance to look  
5 at it.

6 **A. Okay.**

7 Q. Let me see that real quick. I'm just  
8 going to handwrite in 43 since we've already --

9 THE DEPONENT: Did you hear that?

10 MR. ELSTER: Yeah.

11 THE DEPONENT: 43.

12 BY MR. SOLVERUD

13 Q. Who is Ray Wotring?

14 **A. I'm not sure his title. He's a -- I**  
15 **believe he was an employee or a colleague of Bill**  
16 **Wilson.**

17 Q. Okay. And who is Bill Wilson?

18 **A. Bill is a -- lack of a better term, a**  
19 **political consultant.**

20 Q. And there's reference in Exhibit 43 to  
21 somebody named Randy. Do you know who Randy is? Do  
22 you see in the "to" line right next to -- after your  
23 name?

24 **A. Oh. I don't think I know who Randy is**

Edward Martin, Jr.

June 4, 2019

Page 75

1     **there.**

2           Q.     Okay. Exhibit 43 are two emails that Ray  
3     Wotring sent to you and to Bill Wilson, and there's  
4     one to Randy on May 26th and June 3, 2016, right?

5           A.     **That's what this says, yes.**

6           Q.     And --

7           A.     **I'm sorry. You said June 13th? But I**  
8     **think it's June 3rd.**

9           Q.     I thought I said May 26th and  
10    June 3rd, right?

11          A.     **Okay.**

12          Q.     And the subject matter of the emails is  
13    CEL/American Eagles, correct?

14          A.     **The subject is CEL, yes. Either L**  
15    **or -- yes, it looks like CEI is the subject line.**  
16    **Forward, CEI/American Eagles.**

17          Q.     And you understand the CE, either I or L,  
18    is a reference to Citizen Empowerment League, which  
19    was the entity, the predecessor entity to Phyllis  
20    Schlafly's American Eagles?

21                   MR. ELSTER: Objection. Form,  
22    "predecessor entity."

23                   You can answer subject to that.

24                   THE DEPONENT: This refers to what

Edward Martin, Jr.

June 4, 2019

Page 76

1 the attachment is, which is Citizen Empowerment  
2 League, yes.

3 BY MR. SOLVERUD

4 Q. Did you understand the Citizen Empowerment  
5 League was the entity that was eventually converted  
6 over to Phyllis Schlafly's American Eagles?

7 A. These are the articles of incorporation, I  
8 think, of Citizen Empowerment League.

9 Q. I understand that.

10 A. What's that?

11 Q. My question --

12 A. I know. I'm getting to your question.

13 Q. Oh, okay.

14 A. And so what I was clarifying is you said  
15 that this was -- I wasn't sure if you were asking if  
16 this was the organization from its founding or if  
17 there was a predecessor to this organization,  
18 Citizen Empowerment League. That's what I thought  
19 you were -- so these documents are about the Citizen  
20 Empowerment League, yes.

21 Q. Okay. And my question, sir, is Citizen  
22 Empowerment League is the entity that was eventually  
23 transferred over and became Phyllis Schlafly's  
24 American Eagles, correct?

Edward Martin, Jr.

June 4, 2019

Page 77

1           **A.     Citizen Empowerment League, these are the**  
2           **founding documents, and the lawyer's letter. That's**  
3           **what this is. And that -- but it says, "American**  
4           **Eagles." That's not the term that we used, so.**

5           Q.     Put the documents aside.

6           **A.     Oh, okay. Sorry.**

7           Q.     I'm not even asking -- isn't it true that  
8           Citizen Empowerment League was eventually converted  
9           over into Phyllis Schlafly's American Eagles?

10          **A.     Converted over? We changed the name. It**  
11          **was an organization that changed its name.**

12          Q.     Okay. And the name, Citizen Empowerment  
13          League, was changed to Phyllis Schlafly's American  
14          Eagles, correct?

15          **A.     I think it was. I'm not sure if the name**  
16          **initially was changed, or if there was a board put**  
17          **in place and later the name changed. I don't know**  
18          **the timing of that.**

19          Q.     Regardless of the timing, at some point in  
20          time, Citizen Empowerment League's name was changed  
21          to Phyllis Schlafly's American Eagles, correct?

22          **A.     Yes.**

23          Q.     Okay. What was Bill Wilson's role and  
24          involvement in the creation of Phyllis Schlafly's

Edward Martin, Jr.

June 4, 2019

Page 78

1 American Eagles?

2 **A. Bill is a political consultant.**

3 Q. I understand that. We've established  
4 that. What was his role and involvement in the  
5 creation of Phyllis Schlafly's American Eagles?

6 **A. He was a political consultant that helped**  
7 **consult on the need or the desire to have an**  
8 **organization.**

9 Q. Okay. And so with whom did he consult?

10 **A. Phyllis, myself, John, lots of other**  
11 **people. He was -- he's got a broad practice. So he**  
12 **consults with some candidates -- National Right to**  
13 **Work.**

14 Q. I'm asking with whom did he consult in  
15 connection with the creation of Phyllis Schlafly's  
16 American Eagles?

17 **A. Oh. What I can -- I think what I know**  
18 **today is myself, Phyllis, John. I'm not sure if**  
19 **there were others in the organization that he would**  
20 **have consulted with.**

21 Q. Okay. So as you sit here today, the only  
22 people that you're aware of Bill Wilson consulting  
23 with in connection with the creation of Phyllis  
24 Schlafly's American Eagles were you, Phyllis, and



Edward Martin, Jr.

June 4, 2019

Page 79

1 John, correct?

2 A. Well, it looks like also Mr. Strout. I  
3 think probably Alan Dye. I'm not sure if Heidi  
4 Abegg was involved then. So I think there would  
5 have been those. And I don't know whether Bill  
6 would have talked to others. I mean, you have  
7 Randy, this Randy copied on here. I'm not sure who  
8 that is, but I'm just not sure who else. You're  
9 asking the universe of people consulting to. I'm  
10 not sure if I've got it all.

11 Q. Yeah. And all I'm asking is you to tell  
12 me what Bill Wilson's role was with respect to the  
13 creation of Phyllis Schlafly's American Eagles, and  
14 you said he was a political consultant to you, John  
15 Schlafly, Phyllis Schlafly, and possibly others; is  
16 that right?

17 A. Is what right? That's what --

18 Q. Is that your testimony?

19 A. Well, Bill Wilson is a political  
20 consultant and has been for many years, so he's  
21 consulted with all of those parties you mentioned  
22 for years. Probably decades.

23 Q. Ed, if you just listen to my question.

24 A. Okay.

Edward Martin, Jr.

June 4, 2019

Page 80

1 Q. I know this isn't that hard. I'm asking  
2 you about Bill Wilson's role and involvement with  
3 the creation of Phyllis Schlafly's American Eagles,  
4 only Phyllis Schlafly's American Eagles.

5 A. Okay.

6 Q. Okay?

7 A. Yep.

8 Q. Okay. I want you to tell me what  
9 interactions you had with Bill Wilson in connection  
10 with the creation of Phyllis Schlafly's American  
11 Eagles.

12 A. He's a political consultant. So I  
13 consulted with him about this, this organization, as  
14 well as many other things we were doing. So --

15 Q. And what did you consult with Mr. Wilson  
16 about with respect to Phyllis Schlafly's American  
17 Eagles?

18 A. Well, Bill was very helpful in Phyllis'  
19 desire to promote the issues of the Trump agenda and  
20 the Trump campaign. And so when there was a need,  
21 as expressed by Phyllis, to have an organization to  
22 further that, that's when we would have consulted  
23 with Bill. And, again, there would have been  
24 ongoing -- Bill is somebody that I would talk to,

Edward Martin, Jr.

June 4, 2019

Page 81

1 Phyllis would talk to maybe not too frequently on  
2 the phone, but some, and John and others. So that's  
3 the general timing.

4 Bill Wilson was very close to the South  
5 Carolina director of Trump. And so when -- all  
6 along that period in the spring, we would have been  
7 talking, consulting Bill about the issues around  
8 what ended up being this organization.

9 Q. When did you first start consulting with  
10 Bill Wilson? In the spring of 2016?

11 A. No, no. Phyllis was consulting. As soon  
12 as I started working for Phyllis, she was consulting  
13 with Bill.

14 Q. I know, but you said that you were talking  
15 to him in the spring of 2016, and I'm asking you  
16 when in 2016 were you specifically working with Bill  
17 Wilson?

18 A. We were -- again, we were working with  
19 Bill Wilson as a consultant for decades. Phyllis  
20 was. So it would have been, again, all through --

21 Q. I'm -- okay. Is Bill -- strike that.

22 Is Phyllis Schlafly with you right now?

23 A. I'm not sure I understand that.

24 Q. So real quick. I'm only asking --

Edward Martin, Jr.

June 4, 2019

Page 82

1           **A.     The communion of saints says it. So,**  
2       **yeah, if that's what your issue is.**

3           Q.     Is that what you believe?

4           **A.     Excuse me?**

5           Q.     Is -- I'm asking you for your testimony,  
6       and you keep using the word "we" to refer to you and  
7       Phyllis, and so I just want to be clear. You're  
8       testifying on behalf of yourself, right? Do you  
9       understand that?

10          **A.     Yes, sir.**

11          Q.     Okay. So you're not channeling Phyllis in  
12       this deposition, correct?

13          **A.     I can't imagine you mean that as a serious**  
14       **question, Erik.**

15          Q.     I can't imagine I even have to ask that as  
16       a serious question, but the way you're answering the  
17       questions, you seem very confused by this process,  
18       even though you're an attorney, and you've done this  
19       lots of times.

20                 So my question, sir, is your specific  
21       dealings with Bill Wilson, when did they start in  
22       2016?

23          **A.     And my answer to you, again, is they went**  
24       **all year long. Phyllis was -- Bill Wilson was**

Edward Martin, Jr.

June 4, 2019

Page 83

1 someone we talked to about the Trump endorsement in  
2 March.

3 Q. I'm not asking "we." I'm asking you, sir.

4 A. But I worked with Phyllis at that time.

5 Q. And I'm not asking about your work with  
6 Phyllis. I'm asking about your specific dealings  
7 with Bill Wilson. You, nobody else.

8 A. My -- all of that year. We would have  
9 been dealing with Bill. I would have been dealing,  
10 as well as Phyllis, all through 2015, all through  
11 2016.

12 Q. Okay.

13 A. On various issues.

14 Q. Okay. And I'd like you to tell me what  
15 you specifically, not Phyllis, were dealing with,  
16 with Bill Wilson in 2016.

17 A. Bill did a mail, helped us with finding  
18 mail to do mailings for our organizations. Bill  
19 gave -- helped us on strategy. Bill was interested  
20 in Phyllis and my book that was coming out. So  
21 those are the kinds of things we talked to him  
22 about, but he wasn't a full-time -- it wasn't a  
23 full-time thing. It was episodic, periodic.

24 Q. So it wasn't an ongoing thing? It was

Edward Martin, Jr.

June 4, 2019

Page 84

1 episodic?

2           **A.     The relationship with Bill Wilson and**  
3 **Phyllis was two decades long. You'd have to**  
4 **ask -- John would know, I guess, but for me, as long**  
5 **as I worked with Phyllis, Bill Wilson was, A, an**  
6 **ally, and someone we could talk to about issues and**  
7 **talk to about possibilities.**

8           Q.     And Bill Wilson was somebody that provided  
9 services to Eagle Forum, correct?

10           **A.     Bill Wilson was somebody who provided**  
11 **services to all different organizations.**

12           Q.     And one of those organizations that he  
13 provided services to specifically was Eagle Forum,  
14 correct?

15           **A.     I believe so. I think so.**

16           Q.     Okay. And at some point in time, Bill  
17 Wilson provided services to Phyllis Schlafly's  
18 American Eagles; is that right?

19           **A.     Yes.**

20           Q.     Was Bill Wilson paid anything for services  
21 provided to Phyllis Schlafly's American Eagles?

22           **A.     I don't know the answer to that.**

23           Q.     Who would?

24           **A.     I'd probably have to look at the records**

Edward Martin, Jr.

June 4, 2019

Page 85

1 and think about it. Sometimes Bill would be a  
2 facilitator and not someone getting paid for it. It  
3 depended on the situation.

4 Q. Did Phyllis Schlafly's American Eagles  
5 ever transfer monies to Bill Wilson or to any  
6 entities controlled by Bill Wilson?

7 A. I'm not sure. I'd have to check on that.

8 Q. Where would you check?

9 A. I'd probably start with John and look at  
10 our records.

11 Q. And what records would you look at?

12 A. The ones that would show that kind of  
13 thing.

14 Q. And when you say, "our records," you're  
15 talking about Phyllis Schlafly's American Eagles'  
16 records, correct?

17 A. Well, that was what I thought you were  
18 asking. Yes.

19 Q. Okay. And what did Bill Wilson do  
20 specifically in connection with the creation of  
21 Phyllis Schlafly's American Eagles?

22 A. He consulted with us.

23 Q. Okay. And did he charge you for his  
24 consulting services?

Edward Martin, Jr.

June 4, 2019

Page 86

1           **A.     I don't recall that.**

2           Q.     And when you said, "he consulted with us,"  
3     the "us" you're referring to is you, Phyllis  
4     Schlafly, and John Schlafly; is that right?

5           **A.     I mean, I think the universe could be**  
6     **bigger. I don't know if he did -- had discussions**  
7     **with other people that were involved in our efforts.**  
8     **I just don't know.**

9           Q.     Who else was involved with your efforts to  
10    establish Phyllis Schlafly's American Eagles?

11          **A.     I don't recall specifically at this point.**  
12    **Kathleen Sullivan would be one for sure.**

13          Q.     Okay.

14          **A.     But I'm not sure after that. Lots of**  
15    **folks.**

16          Q.     So the only people you can recall, as you  
17    sit here today, as being involved in the creation of  
18    Phyllis Schlafly's American Eagles are yourself,  
19    John Schlafly, Phyllis Schlafly, and Kathleen  
20    Sullivan; is that right?

21          **A.     I'd have to maybe be refreshed on who**  
22    **else -- you're saying was consulted by Bill? That's**  
23    **the question? Or just, in general, involved?**

24          Q.     I said, "as being involved in the creation



Edward Martin, Jr.

June 4, 2019

Page 87

1 of Phyllis Schlafly's American Eagles."

2 A. I thought you were asking about Bill  
3 Wilson's consultation. I think a lot of people were  
4 in on -- at that point Phyllis' desire was to, as  
5 stated to me, was to make sure that her voice wasn't  
6 silenced in the next months before the election. So  
7 there would have been lots of people, I think,  
8 involved.

9 Q. And can you identify who the people were,  
10 other than yourself, Kathleen Sullivan, Phyllis  
11 Schlafly, and John Schlafly?

12 A. Not off the top of my head. Probably some  
13 of her children. You know, probably some of her  
14 folks. I don't know. I just -- I'm not -- I guess  
15 what I'm saying is there must have been others, but  
16 I'm not sure right now who they are.

17 Q. On May 26, 2016, Ray Wotring says, "On  
18 Page two, item 3, she will find exactly what she is  
19 seeking." Do you know who Ray Wotring is referring  
20 to?

21 MR. ELSTER: Objection to the extent  
22 it calls for speculation.

23 THE DEPONENT: Could you repeat that?  
24 I'm sorry.

Edward Martin, Jr.

June 4, 2019

Page 88

1 THE REPORTER: "On May 26, 2016, Ray  
2 Wotring says, 'On Page two, item 3, she will find  
3 exactly what she is seeking.' Do you know who Ray  
4 Wotring is referring to?"

5 THE DEPONENT: I don't. I don't know  
6 what -- what it's referring to, and I don't know who  
7 that is.

8 (Plaintiff's Exhibit 44, previously marked, was  
9 identified for the record.)

10 BY MR. SOLVERUD

11 Q. All right. Let me show you a document  
12 marked Exhibit 44 from a prior deposition. Tell me  
13 when you've had a chance to look at that.

14 A. Okay.

15 Q. The top of Exhibit 44 is an email from Ray  
16 Wotring to you, dated June 6, 2016, correct?

17 A. Yes.

18 Q. And this refers to an application to the  
19 United States Postal Service; is that right?

20 A. Yes.

21 Q. Do you recall what Phyllis Schlafly's  
22 American Eagles was applying to do with respect to  
23 the U.S. Postal Service back in June of 2016?

24 A. As we sort of were beginning -- and this

Edward Martin, Jr.

June 4, 2019

Page 89

1 is a few weeks after starting -- I think this is  
2 about getting a mail permit for sending, for sending  
3 mail.

4 Q. And why did PSAE need a mail permit?

5 A. To be able to mail.

6 Q. Okay. As of June 2016, what was PSAE  
7 planning to mail?

8 A. Oh, I can't remember on that timing. I  
9 don't know the timing of that, how to answer that.

10 Q. Well, prior to June 6, 2016, are you aware  
11 of any plans by PSAE to engage in any mailing  
12 activities?

13 A. I don't recall specifically the timing,  
14 but certainly it would be something discussed.

15 Q. Was one of the things that was discussed  
16 prior to June of 2016 was a direct mail campaign by  
17 Phyllis Schlafly's American Eagles?

18 A. I don't know what the timing was, and I  
19 don't know what you're describing. We certainly  
20 would have thought to make Phyllis' voice on those  
21 issues heard, we needed to do all different kinds of  
22 outreach, whether it was her book if that became  
23 something we decided to publish in a different way  
24 or mail. So I don't know the timing of that.

Edward Martin, Jr.

June 4, 2019

Page 90

1 Q. One of the things that you did discuss as  
2 part of the creation of Phyllis Schlafly's American  
3 Eagles was the need to engage in some form of  
4 mailing or direct mailing, correct?

5 A. Again, you asked me about the timing.

6 Q. And I just asked you a separate question.  
7 I didn't say anything about timing.

8 A. Okay. Well, I'll respond to that. When  
9 Phyllis -- when we started a new organization to  
10 make sure that Phyllis' views on the Trump agenda  
11 were heard, we would have used all -- we would have  
12 been considering all of the tools that Phyllis had  
13 used for 50 years. So one would be publishing, one  
14 would be mail, one would be in-person appearances.  
15 All kinds of things we'd think about.

16 Q. And you understood that you needed a mail  
17 permit in order to accomplish the objective of  
18 communicating to the public and to supporters,  
19 correct?

20 A. I understood that consultants that knew  
21 how these things worked were telling me how to  
22 proceed, so I understood that. I think that's  
23 right. So, yes.

24 Q. So is it your testimony, sir, that you

Edward Martin, Jr.

June 4, 2019

Page 91

1 didn't know that you would need a mail permit  
2 without getting advice from a political consultant?

3 A. Well, no. You asked about mailing. You  
4 can mail anytime you want. The question is whether  
5 you get a permit to do special rates, and to be able  
6 to get timing.

7 Q. And you --

8 A. So when it came to this, this was  
9 a -- some process that I had never been involved in.  
10 Phyllis had been involved in, John perhaps. So I  
11 relied on people who had been through the process.

12 Q. And the people you were relying on were  
13 Ray Wotring and Bill Wilson; is that right?

14 A. Well, I can't say for sure. Certainly  
15 they had some -- Ray had some role. I think I would  
16 have been talking to Phyllis at the time, and John,  
17 probably the lawyers referred on the previous  
18 document. So it was a busy time.

19 Q. Was Phyllis Schlafly's American Eagles a  
20 philanthropic organization?

21 A. I don't know what the definition of it is.  
22 If you're referring to this email?

23 Q. Yes, sir.

24 A. I'm not sure what that definition is to

Edward Martin, Jr.

June 4, 2019

Page 92

1 know what they're doing on the permits. I don't  
2 know.

3 Q. Does Phyllis Schlafly's American Eagles  
4 engage in philanthropy?

5 A. Well, we're a -- we engage in our mission,  
6 a c4 mission to promote the Trump agenda. So I'm  
7 not sure what "philanthropy" means in this sentence.

8 Q. I'm not asking in this sentence. You can  
9 put the document aside. I'm asking you, sir, does  
10 Phyllis Schlafly's American Eagles engage in  
11 philanthropy?

12 A. I don't know what that means. What does  
13 "philanthropy" mean? I mean, we do a lot of nice,  
14 good things to try to make America great.

15 Q. If you don't know what "philanthropy"  
16 means, then you can't answer my question.

17 A. Yeah, I don't know what your -- I don't  
18 know what your question means.

19 Q. Ray Wotring told you on June 6th that  
20 "They won't let a c4 be educational. So dumb." Do  
21 you know why -- strike that.

22 Did you have an understanding as to the c4  
23 being a reference to Phyllis Schlafly's American  
24 Eagles?

Edward Martin, Jr.

June 4, 2019

Page 93

1 MR. ELSTER: Objection. Speculation.

2 THE DEPONENT: I'm sorry. I  
3 was . . .

4 THE REPORTER: "Did you have an  
5 understanding as to the c4 being a reference to  
6 Phyllis Schlafly's American Eagles?"

7 THE DEPONENT: Well, I think so.  
8 It's in the subject line, so I think it is.

9 BY MR. SOLVERUD

10 Q. I think it's a pretty obvious question.

11 A. Sorry. I wanted to know if you were  
12 talking about the mail -- this mail woman, Rosemary  
13 Kretschmer, yes.

14 Q. Did you ever consider Phyllis Schlafly's  
15 American Eagles to be an educational organization?

16 A. The expert on this, in my work is John on  
17 how these organizations fit together. I think we'd  
18 say the c4 was educational, but with a certain  
19 focus, and it was for the public benefit. So I  
20 don't know the definitional -- as it's in this  
21 email.

22 Q. What was the sort of focus of the c4,  
23 Phyllis Schlafly's American Eagles, when it came to  
24 educational?

Edward Martin, Jr.

June 4, 2019

Page 94

1           **A.     Making the people understand Phyllis'**  
2 **positions as it related to the Trump agenda in that**  
3 **time period.**

4                   **(Plaintiff's Exhibit 45, previously**  
5 **marked, was identified for the record.)**

6 **BY MR. SOLVERUD**

7           Q.     Let me show you a document marked  
8 Exhibit 45. Tell me when you've had a chance to  
9 look at that.

10           **A.     Okay.**

11           Q.     And in Exhibit 45, John Schlafly refers to  
12 opening a bank account for PSAE. Do you see that  
13 about halfway down?

14           **A.     Yes.**

15           Q.     Do you recall that that's the BB&T bank  
16 account that was opened in Virginia?

17           **A.     I don't recall that.**

18           Q.     Up above, Ray Wotring tells John, "A bank  
19 account already exists. I have the signature cards  
20 from Ed already, however I'm turning them in until  
21 we get the full board and names switchover  
22 complete." Are you aware of any bank account, other  
23 than the BB&T bank account, that you provided  
24 signature cards to Ray Wotring for?



Edward Martin, Jr.

June 4, 2019

Page 95

1           A.    I believe this refers to the BB&T, the  
2   first part of your question.

3           Q.    Okay.

4           A.    I don't know what this is about, open a  
5   bank account for PSAE. I don't know what that means  
6   there because --

7           Q.    But you understood BB&T was a  
8   PSAE -- strike that.

9                    You understood that BB&T was a Phyllis  
10   Schlafly's American Eagles bank account, right?

11          A.    Yes, but it's -- when -- it existed and  
12   changed its name. So it existed before it changed  
13   its name. So there's one organization and a bank  
14   account that had -- that existed, I believe, for  
15   legal purposes.

16          Q.    It was -- it was a bank account that was  
17   associated with Citizen Empowerment League that was  
18   then changed over to Phyllis Schlafly's American  
19   Eagles, correct?

20          A.    It wasn't associated with it. It was a  
21   bank account. The name on the account was Citizen  
22   Empowerment League.

23          Q.    Okay.

24          A.    When they changed the organization name,

Edward Martin, Jr.

June 4, 2019

Page 96

1 it became Phyllis Schlafly's American Eagles, and  
2 the changeover was to that. So it's one bank  
3 account that existed.

4 Q. How much money --

5 A. I think.

6 Q. How much money was in the bank account  
7 when it changed over?

8 A. I don't know that answer.

9 Q. John Schlafly refers to a handful of  
10 response to both mailings. What mailings had gone  
11 out as of June 2016?

12 A. I'm not sure what those mailings were at  
13 that date.

14 Q. He says -- in his email he says, "It  
15 appears that the entire PSAE mailing printed only  
16 5-digit zip codes on all the reply forms." Do you  
17 see that?

18 A. Yes.

19 Q. Do you have any recollection as to the  
20 PSAE mailing that printed only five-digit zip codes?

21 A. I'm not sure the timing, but -- so I don't  
22 know if I recall that, that discussion.

23 Q. Do you recall what the first mailing was  
24 that was sent out by PSAE?

Edward Martin, Jr.

June 4, 2019

Page 97

1           **A.     Not the timing.**

2           Q.     I'm not asking about the timing.

3           **A.     Oh.**

4           Q.     I'm asking you do you recall what the  
5 first mailing that was sent out by PSAE was?

6           **A.     Not as we sit here.**

7           Q.     Do you know how many mailings that PSAE  
8 has sent out?

9           **A.     Not a specific number, no.**

10          Q.     Do you know whether it was more than ten  
11 or less than ten?

12          **A.     That's -- I'm not sure how you'd count**  
13 **that, but . . .**

14          Q.     And by the way, you're doing this work for  
15 PSAE in June of 2016, right? You're the one sort of  
16 coordinating these things on the PSAE side; is that  
17 fair?

18                   MR. ELSTER: Objection. Vague as to  
19 "coordinating these things."

20                   THE DEPONENT: I was tasked by  
21 Phyllis to help with this effort.

22           BY MR. SOLVERUD

23          Q.     Okay. Were you being paid for your work  
24 on behalf of PSAE?

Edward Martin, Jr.

June 4, 2019

Page 98

1           **A.     No.**

2           Q.     Have you ever been paid for your work on  
3     behalf of PSAE?

4           **A.     I think at one point there was some**  
5     **compensation, but I can't --**

6           Q.     What compensation was it?

7           **A.     I don't recall that now.**

8           Q.     When were you given compensation by PSAE?

9           **A.     I don't recall the timing.**

10          Q.     Do you know what year it was in?

11          **A.     I don't recall the timing.**

12                     MR. SOLVERUD:   Let's go off.   Let me  
13     shut that door, that noise.

14                     THE VIDEOGRAPHER:   Off the record at  
15     10:58 a.m.

16                     (Whereby a short break was taken.)

17                     THE VIDEOGRAPHER:   Back on the record  
18     at 11:00 o'clock a.m.

19     BY MR. SOLVERUD

20           Q.     Do you recall what the response was to the  
21     initial mailings that were sent out by Phyllis  
22     Schlafly's American Eagles?

23           **A.     No.**

24

Edward Martin, Jr.

June 4, 2019

Page 99

1 (Exhibit 53, previously marked, was  
2 identified for the record.)

3 BY MR. SOLVERUD

4 Q. Let me show you a document that's been  
5 marked Exhibit 53. Let me know if you've had a  
6 chance to look at it. Are you ready?

7 **A. Yes.**

8 Q. If you look at the second page of  
9 Exhibit 53, you write, "I would like to do this  
10 today or tomorrow." Do you see that?

11 **A. No.**

12 Q. Right up top.

13 **A. I would like to do this dated today or**  
14 **tomorrow.**

15 Q. Yes. I'm sorry.

16 **A. Right.**

17 Q. "I would like to do this dated today or  
18 tomorrow." And you sent that on September 3rd?

19 **A. Mm-hmm.**

20 Q. And the "this" that you're referring to is  
21 setting up a super PAC?

22 **A. Uh-huh.**

23 Q. And what was the name of the super PAC?

24 **A. Phyllis Schlafly's Eagle Super**

Edward Martin, Jr.

June 4, 2019

Page 100

1 PAC -- Eagle PAC. It's not -- the "super" is not in  
2 the name. Phyllis Schlafly's Eagle PAC.

3 Q. Let's just be clear.

4 A. Yeah.

5 Q. What was the name of the super PAC that  
6 you wanted to set up?

7 A. Phyllis Schlafly's Eagle PAC.

8 Q. Okay. And why did you want to do this  
9 dated today or tomorrow on September 3rd?

10 A. Our -- many reasons, but my -- our hope  
11 was the book, the Trump book launched on Tuesday,  
12 four days later, and I had been trying to figure out  
13 a way to produce a couple million copies and  
14 distribute them. So I was pushing to have done this  
15 earlier ahead of that because I was going to be in  
16 New York on Tuesday, Wednesday, Thursday of the next  
17 week launching the book. So I had somebody thinking  
18 they might be willing to contribute a couple of  
19 million dollars to do that. So we were -- there was  
20 some pressure to do that, and Phyllis had agreed  
21 that we would support Trump and also Roy Blunt in  
22 the fall election if there was a way to do that.

23 Q. And who was the person that was possibly  
24 willing to contribute millions of dollars?

Edward Martin, Jr.

June 4, 2019

Page 101

1           A.    Oh, it was -- there was hopeful stuff, but  
2   it was -- I'd ask a few different donors. The Drury  
3   family here. I was out pushing to try to find  
4   someone. It didn't go very far.

5           Q.    Other than the Drury family, who else?

6           A.    I don't recall that.

7           Q.    So you just testified that there was  
8   somebody that was willing to contribute millions of  
9   dollars, but you don't recall anybody other than the  
10   Drury family?

11          A.    No. What I had -- what -- what I had done  
12   was try to figure out if we could pulp the book,  
13   produce it in paperback, and get lots of copies, and  
14   that was possible. And then I was asking to try to  
15   find somebody, and, you know, whether it was  
16   contributions to do that. I'm not sure how far it  
17   got, but that was the reason we were trying to get  
18   ahead of the launch of the book, to have that as the  
19   book broke -- and it did -- it was going to be  
20   popular -- we'd have something to talk about to do.  
21   That was part of the timing.

22          Q.    Who was your contact at the Drury family?

23          A.    I'm not sure who I talked to then. I've  
24   known all of them for a long time, so.

Edward Martin, Jr.

June 4, 2019

Page 102

1 Q. So do you have any emails from your  
2 contact with the Drury family?

3 A. I don't recall that.

4 Q. You don't recall if you've got emails?

5 A. About this topic?

6 Q. Yeah.

7 A. I don't recall that, no.

8 Q. Who are your contacts at the Drury family?

9 A. I know all the family.

10 Q. Can you tell us their names?

11 A. Mr. and Mrs. Drury.

12 Q. Do you know their full names?

13 A. Charles and Shirley.

14 Q. Okay.

15 A. And Tim, and I know the rest of them, but  
16 not as well. Chuck is one of the sons, I think.

17 Q. And who had you talked to specifically as  
18 between Charles and Shirley, Tim or Chuck about  
19 possibly doing any millions of dollars to help with  
20 the publishing of the book?

21 A. I don't recall that now. It was something  
22 I was hoping to do, so.

23 Q. And what does the significance -- or  
24 strike that.



Edward Martin, Jr.

June 4, 2019

Page 103

1           Why did you need Phyllis Schlafly's Eagle  
2       PAC in order to do that?

3           **A.     It was Phyllis' book.   It was**  
4       **Phyllis' -- we were continuing to try to help**  
5       **promote the Trump agenda.   That was what Phyllis was**  
6       **doing.**

7           Q.     And why did you need a super PAC to do  
8       that?

9           **A.     It seemed to be a better vehicle.   I don't**  
10       **know that we needed it, but we wanted it to be**  
11       **ready.**

12          Q.     Who told you that -- you see -- you say,  
13       "we."   Who told you that that would be a better  
14       vehicle?

15          **A.     I'm not sure I recall who that was right**  
16       **now.**

17          Q.     Who did you consult with about the super  
18       PAC other than Mr. Wotring and Ms. --

19          **A.     I'm not sure I remember now, but probably.**

20          Q.     And did you have any discussions with  
21       anybody else?

22          **A.     I'm sure I did.**

23          Q.     And who else?

24          **A.     I'm not sure I recall now.**

Edward Martin, Jr.

June 4, 2019

Page 104

1 Q. And what -- why did you need it dated as  
2 of September 3rd or September 4th?

3 A. Well, I was -- something we -- I  
4 was -- the book was going on all summer and was  
5 delayed, and I was trying to get this done ahead of  
6 the book launch, and so it was one of the many  
7 things that were happening. We were sort of busy  
8 time, rushing towards an election day, trying to get  
9 a lot of things going.

10 Q. Well, wasn't it one of the things you were  
11 trying to do is get it done before Phyllis Schlafly  
12 died on September 5th?

13 MR. ELSTER: Objection. Form,  
14 foundation.

15 THE DEPONENT: It was certainly  
16 something she wanted us to do, wanted me to do, so I  
17 was happy to be doing that.

18 BY MR. SOLVERUD

19 Q. And as of September 3rd or  
20 September 4th, Phyllis Schlafly was already in the  
21 hospice?

22 A. I don't know when she was in hospice.  
23 That wasn't something I knew.

24 Q. You knew --

Edward Martin, Jr.

June 4, 2019

Page 105

1           A.     I mean, hospice. I don't know. She was  
2     not feeling well, not doing well, but hospice was --

3           Q.     Nobody ever told you when she was in  
4     hospice care?

5           A.     I don't recall being included. I was not  
6     included in things like that, medical discussion too  
7     much. So I don't remember her being in hospice. I  
8     know she was -- it was a long --

9           Q.     Did you talk with Phyllis Schlafly on  
10    September 3rd or September 4th about the  
11    creation of a super PAC using her name?

12          A.     I'm not sure when I talked to her, timing  
13    wise. I certainly talked to her about it.

14          Q.     So did you talk to her on September 3rd  
15    or September 4th about the creation of Phyllis  
16    Schlafly's Eagle PAC?

17          A.     I think I only saw her on the 3rd. I'm  
18    not sure of the timing, so I don't know if I talked  
19    to her about that. I doubt it.

20          Q.     Okay. Who else was involved with the  
21    creation of Phyllis Schlafly's Eagle PAC?

22          A.     I'm not sure at this point who I talked to  
23    about it. It was a very busy time, down the stretch  
24    of the election, and we were looking for all

Edward Martin, Jr.

June 4, 2019

Page 106

1 different kinds of ways to promote the positions and  
2 policies. So I imagine I talked to lots of people,  
3 but I can't sit here and say for sure.

4 Q. And as of September 5, 2016, were you  
5 still employed by Eagle Forum?

6 A. C4?

7 Q. Yes.

8 A. Yes.

9 Q. Did you --

10 A. Although I'm not sure I was being paid,  
11 but, yes.

12 Q. Did you discuss Phyllis Schlafly's Eagle  
13 PAC with anybody at Eagle Forum?

14 A. I don't recall that now.

15 Q. Did you present the opportunity of Phyllis  
16 Schlafly's Eagle PAC to the Eagle Forum board of  
17 directors?

18 MR. ELSTER: Objection to the extent  
19 it calls for a legal conclusion as to opportunity.

20 THE DEPONENT: I don't recall who I  
21 would have talked about it -- to about that. Before  
22 the point that Phyllis -- before Phyllis died, she  
23 was the person we -- I talked to about things like  
24 that, so.

Edward Martin, Jr.

June 4, 2019

Page 107

1 BY MR. SOLVERUD

2 Q. Did you --

3 **A. Excuse me.**

4 Q. Are you okay?

5 **A. Yeah.**

6 MR. ELSTER: Get a sip of water.

7 BY MR. SOLVERUD

8 Q. Tell me when you're ready.

9 **A. Ready.**

10 Q. And at any time, did you ever discuss or  
11 disclose the opportunity of Phyllis Schlafly's Eagle  
12 PAC to the Eagle Forum board of directors?

13 MR. ELSTER: Objection. Form.  
14 Compound, and legal conclusion.

15 THE DEPONENT: I'm not sure I  
16 understand what you're referring to, but it would  
17 have been something I talked to Phyllis about.

18 BY MR. SOLVERUD

19 Q. Okay. So is the answer to my question  
20 now -- so I asked -- I didn't ask about Phyllis. I  
21 asked about the board of directors.

22 **A. Well, Phyllis was on the board.**

23 Q. And --

24 **A. So, yes. Therefore, yes, I talked to**

Edward Martin, Jr.

June 4, 2019

Page 108

1     **Phyllis about it.**

2           Q.     Did you talk -- did you disclose anything  
3     to the entire board of directors?

4           **A.     No.**

5           Q.     Okay. At any time did you ever make a  
6     disclosure to the entire board of directors  
7     regarding the creation of Phyllis Schlafly's Eagle  
8     PAC?

9           **A.     Well, I think they would have known about**  
10    **it, certainly, but it became public very quickly, of**  
11    **course, but also it's a different entity. Remember,**  
12    **it's not a c4. C4s couldn't do some of what it**  
13    **ended up doing. That was the reason it was**  
14    **positioned that way.**

15          Q.     I'm not asking -- all I'm asking is  
16    whether you made any sort of disclosure to the Eagle  
17    Forum board of directors, the entire board,  
18    regarding the creation of Phyllis Schlafly's Eagle  
19    PAC.

20          **A.     I made disclosures, as was our custom, to**  
21    **our chairman who was involved in that kind of**  
22    **decision, and would recognize and encourage if**  
23    **something was good or bad to do, and then where it**  
24    **fits into her universe of organizations. So that**

Edward Martin, Jr.

June 4, 2019

Page 109

1 would be -- that was the practice at the time, and  
2 that was what we did.

3 Q. Okay. And so because that was the  
4 practice, did you ever make any disclosures to the  
5 entire board of directors of Eagle Forum about any  
6 opportunities if the practice was just talk to  
7 Phyllis?

8 MR. ELSTER: Objection. Form. Vague  
9 as to "opportunities," and legal conclusion.

10 THE DEPONENT: I'm sure I talked to  
11 the board members. I mean, the ones that weren't  
12 suing us. We would talk about some of these issues.  
13 But, again, it was Phyllis as the chairman was the  
14 person, who, absent an annual meeting, was in charge  
15 of those kinds of decisions, so.

16 BY MR. SOLVERUD

17 Q. And did you make any disclosure to the  
18 board of directors that were suing you regarding  
19 Phyllis Schlafly's Eagle PAC?

20 A. I don't recall doing that.

21 Q. You provided phone numbers for yourself?

22 A. Mm-hmm.

23 Q. What are those two numbers?

24 A. Where?

Edward Martin, Jr.

June 4, 2019

Page 110

1 Q. In the middle where it says, "ed@phyllis  
2 schlafly.com," and there's a number that's  
3 (314) 606-6462?

4 **A. That's my cell phone.**

5 Q. Okay. And then there's a number that's  
6 (314) 725-6003?

7 **A. Yes, sir.**

8 Q. What is that?

9 **A. That's a phone line for America's Future.**

10 Q. Okay.

11 **A. That rings directly to my desk.**

12 Q. So there's a hard -- that's a hard line?

13 **A. Yes.**

14 Q. It's not a separate cell phone?

15 **A. Correct. It's a hard line.**

16 Q. Okay. And then the -- is this the email  
17 that you were using at the time,  
18 ed@phyllisschlafly.com?

19 **A. Same place? Yeah, yes.**

20 Q. Ms. Abegg asked, "Is this to be a super  
21 PAC or a connected PAC?" What was the answer to  
22 that?

23 **A. I'm sorry. Where is it?**

24 Q. The very first line.



Edward Martin, Jr.

June 4, 2019

Page 111

1           **A.    Oh.   I don't think there is an answer on**  
2 **this thread.**

3           Q.    I'm asking you what's the answer.

4           **A.    Oh.**

5           Q.    Was this to be a super PAC or a connected  
6 PAC?

7           **A.    No.   It was a super PAC.**

8           Q.    Okay.   And in your mind, what's the  
9 significance of it being a super PAC versus a  
10 connected PAC?

11          **A.    I'm not -- this is a question for lawyers,**  
12 **but lawyers specializing in things like this.   I**  
13 **don't know.   What I knew we wanted to do was be able**  
14 **to advocate directly for the president's election**  
15 **and candidates' election, and so that was the best**  
16 **vehicle according to the lawyers.**

17          Q.    And you just said, "we."   On  
18 September 5th, who is the "we" that you're  
19 referring to?

20          **A.    Well, all of what we did was Phyllis'**  
21 **work.   So we -- all of our folks and Phyllis and**  
22 **everything else.   So it's --**

23          Q.    I appreciate "all of our folks," but I  
24 need to know the specific people, so.

Edward Martin, Jr.

June 4, 2019

Page 112

1           A.     The people that wanted to save the country  
2     because it was going in the crapper. That's the  
3     people. So it's -- and the super PAC was something  
4     Phyllis knew the tool to use. She knew how to use  
5     all the tools on the table, and that's what we were  
6     doing. So when you say there's no one -- there was  
7     no sort of special board there. It was get a tool  
8     to be able to use it in case we needed to use it,  
9     so.

10           Q.    Well, on September 5th, Phyllis  
11    Schlafly's passed away?

12           A.    Correct.

13           Q.    And you're telling me that's what she  
14    wanted to do, and I'm asking on September 5th who  
15    was the "we" that you're referring to? It wasn't  
16    Phyllis Schlafly.

17           A.    Well, our -- the people that wanted to do  
18    this. We keep going around in circles. A whole  
19    bunch of people, whether it was John or Phyllis when  
20    she was alive -- not your clients -- that wanted  
21    this candidate to win for president. We were trying  
22    to put that together. So if you want me to say,  
23    "I," it was certainly I was the person who  
24    initiating it, to have that tool.

Edward Martin, Jr.

June 4, 2019

Page 113

1 Q. Who did you communicate with specifically  
2 regarding the formation of Phyllis Schlafly's Eagle  
3 PAC?

4 A. Well, Heidi Abegg.

5 Q. Okay.

6 A. Phyllis before she passed away. I don't  
7 know how much I talked to anybody else like Kathleen  
8 or any of the others. I just -- I don't know that.  
9 John. I'm not sure how much -- again, one gazillion  
10 things going on down the stretch. So that's -- I'm  
11 just not sure who else I talked to. You can refresh  
12 me with some documents, I assume.

13 Q. I've shown you lots of documents. I'm not  
14 sure anything is going to refresh your recollection.

15 (Exhibit 56, previously marked, was  
16 identified for the record.)

17 BY MR. SOLVERUD

18 Q. Let me show you a document marked  
19 Exhibit 56.

20 A. Okay.

21 Q. This is an email exchange between you and  
22 Ray Wotring on September 6, 2016, correct?

23 A. Yes.

24 Q. And it refers to final ART for the Nevada

Edward Martin, Jr.

June 4, 2019

Page 114

1 of voter registration, right?

2 **A. Correct.**

3 Q. What was that?

4 **A. What was the final ART?**

5 Q. What was the Nevada version of voter  
6 registration?

7 **A. Oh. As I recall, it was an effort to**  
8 **register veterans in Nevada.**

9 Q. And who was working on this project?  
10 Which of your entities was working on this project?

11 **A. You'd have to help me. I'm not sure if it**  
12 **was -- I don't know right now.**

13 Q. So as you sit here today, can you tell us  
14 whether the Nevada version of voter registration was  
15 a PSAE project versus an EFELDF project or some  
16 other entity?

17 **A. I can't tell you right now. I think it**  
18 **could have -- may have even been one of the other**  
19 **organizations. I don't recall the specifics of it.**  
20 **Again --**

21 Q. What other organization could it have  
22 been?

23 **A. Well, America's Future had some veterans'**  
24 **outreach kind of things that they did.**

Edward Martin, Jr.

June 4, 2019

Page 115

1 Q. Okay.

2 A. Because of General Singlaub in charge, but  
3 I just don't remember this --

4 Q. Okay.

5 A. -- well.

6 Q. You approved the artwork without  
7 consulting with anybody else for this project,  
8 right?

9 MR. ELSTER: Objection. Foundation,  
10 form.

11 BY MR. SOLVERUD

12 Q. You can answer.

13 A. I'm not sure if I consulted with anybody  
14 else.

15 (Plaintiff's Exhibit 57, previously  
16 marked, was identified for the record.)

17 BY MR. SOLVERUD

18 Q. Okay. Let me show you a document marked  
19 Exhibit 57. Let me know after you've had a chance  
20 to look at it.

21 A. Okay.

22 Q. What was John nervous about in September  
23 of 2016?

24 A. I can't say for sure, but lots of things.

Edward Martin, Jr.

June 4, 2019

Page 116

1 Q. Well, specifically with respect to the  
2 voter registration project that's reflected in -- or  
3 referred to in Exhibit 57.

4 A. I -- I think you can ask John what his  
5 nerves were, nervousness was.

6 Q. Well, Bill Wilson on September 15, 2016  
7 writes in his email to you, "Ed, this is for you and  
8 John. You can use this from Webster,  
9 Chamberlain & Bean, which ought to calm any nerves."  
10 What nerves did you understand he's referring to  
11 that needed to be calmed?

12 MR. ELSTER: Objection. Speculation.

13 THE DEPONENT: I don't -- we always  
14 are very careful, and that would be something that  
15 would -- in this kind of time, timing, you know,  
16 before an election, you want to be very careful to  
17 do things --

18 BY MR. SOLVERUD

19 Q. Was John --

20 A. -- correctly and well.

21 Q. Sorry. Are you done?

22 A. Uh-huh.

23 Q. Was John concerned about violations of any  
24 federal election laws or IRS regulations in

Edward Martin, Jr.

June 4, 2019

Page 117

1 connection with the voter registration process?

2 MR. ELSTER: Objection. Compound.

3 THE DEPONENT: I don't know what John  
4 thought.

5 BY MR. SOLVERUD

6 Q. Did John ever talk to you about that  
7 issue?

8 A. We -- John and I -- talked a lot about how  
9 to do things correctly and carefully and well, and  
10 he's a very deliberative guy. So he -- it's very  
11 helpful in this kind of process where a lot of  
12 things happen fast. John is a great resource to  
13 say, "Let's work through this."

14 Q. And did John ever come to you and tell you  
15 that he was concerned that things weren't being done  
16 appropriately?

17 A. John's always a -- check on our stuff. So  
18 I don't know that he ever said that, but he's always  
19 very careful to say, "How do we think through this?"  
20 You know, recall that Phyllis was a pioneer on how  
21 these organizations fit together, and John was the  
22 engineer of that, working for the last four years.

23 Q. Did John Schlafly ever come to you and  
24 express concerns that you were engaging in

Edward Martin, Jr.

June 4, 2019

Page 118

1 activities on behalf of either PSAE or EFELDF that  
2 might be potential violations of either federal  
3 election campaign laws or IRS regulations?

4 MR. ELSTER: Objection. Compound.

5 THE DEPONENT: Not that I recall, no.

6 BY MR. SOLVERUD

7 Q. Did John Schlafly ever come to you and  
8 express concern or tell you that he did not believe  
9 the voter registration project was a legitimate  
10 activity for either PSAE or EFELDF to be involved  
11 in?

12 MR. ELSTER: Objection. Compound and  
13 vague.

14 THE DEPONENT: As much as I can  
15 recall, and I'd be happy to be refreshed on this if  
16 you have documents. John was doing what John does  
17 in almost every setting, which is to be a check on  
18 what we're doing, and so I don't know what his  
19 expression would -- sometimes John will express  
20 reservations, and therefore we won't do a project,  
21 or we will. So I don't know in this case if that  
22 happened, but that's one of the values of John.

23 BY MR. SOLVERUD

24 Q. You need John because you don't understand



Edward Martin, Jr.

June 4, 2019

Page 119

1 the rules and regulations governing these types of  
2 activities; is that true?

3 **A. John is better than I am at understanding**  
4 **this, Erik. He's the best.**

5 Q. Do you understand the rules and  
6 regulations?

7 **A. I rely on an incredibly talented team to**  
8 **help figure it out.**

9 Q. Who did you rely on?

10 **A. John.**

11 Q. Who else?

12 **A. Well, you see it on here. John Strout,**  
13 **Heidi. People that have a sense of this, and they**  
14 **help you come to these.**

15 Q. Who is John Strout?

16 **A. Was that his name? He was on here.**

17 Q. I don't know. You just said his name.

18 **A. I think he's a lawyer there. Is he with**  
19 **that law firm? I'm not too familiar with him.**

20 Q. You just said he's one of the people you  
21 relied on.

22 **A. In this document you refer to. You refer**  
23 **to Ray's statement, and John is on here. So that's**  
24 **the law firm. If you'd like me to state it more**

Edward Martin, Jr.

June 4, 2019

Page 120

1 broadly, the law firm that Heidi Abegg is at, which  
2 is one of her colleagues, is who I meant to refer  
3 to.

4 (Plaintiff's Exhibit 59, previously  
5 marked, was identified for the record.)

6 BY MR. SOLVERUD

7 Q. Let me show you a document that's been  
8 marked Exhibit 59. Tell me when you've had a chance  
9 to look at it.

10 A. Okay.

11 Q. You're forwarding an invoice from SMPS  
12 Consulting, LLC, to Ray Wotring and Heidi Abegg,  
13 correct?

14 A. I'm forwarding an invoice and a check, a  
15 copy of a check.

16 Q. Okay. Who was Scott Foernsler?

17 A. I don't see the name, Scott Foernsler,  
18 anywhere on this.

19 Q. That's fine. Can you answer my question,  
20 sir?

21 A. It looks like there's an email from him,  
22 so I'm not sure what his -- whether -- I'm not sure.

23 Q. Okay. So you don't know who he is?

24 A. I can see that he worked for this

Edward Martin, Jr.

June 4, 2019

Page 121

1 consulting company. Beyond that, I don't recall  
2 right now who he is.

3 Q. What is SMPS Consulting, LLC?

4 A. That's the -- an entity that did a bunch  
5 of these emails, so I believe it's a general  
6 consulting, or maybe it's a mail house. I'm not  
7 sure whether their -- what their exact -- what their  
8 exact description of it, but it's a consulting.

9 Q. You're the only individual associated with  
10 Phyllis Schlafly's Eagle PAC as of September 2015,  
11 correct?

12 MR. ELSTER: Objection. Vague as to  
13 "associated."

14 THE DEPONENT: I think so.

15 BY MR. SOLVERUD

16 Q. Yeah. And you entered into a contract or  
17 agreement with SMPS Consulting, correct?

18 A. They did some work for us, and we paid  
19 them for it.

20 Q. You keep -- you use the word "us" again,  
21 but it's just you, correct?

22 A. Well, the super PAC, yes. I mean, the  
23 people that were helping on this were -- again, I'm  
24 not sure if Ray was and Heidi, but, yes, it's -- the

Edward Martin, Jr.

June 4, 2019

Page 122

1 **Eagle super PAC, our PAC.**

2 Q. You're the treasurer?

3 **A. Uh-huh.**

4 Q. There was no board that ran it, correct?

5 **A. Correct.**

6 Q. It was just you, correct?

7 **A. Correct. It's a super PAC.**

8 Q. Was there any structure that managed or  
9 operated Eagle Forum -- or strike that.

10 Was there any board or other organization  
11 that either was connected to or managed Phyllis  
12 Schlafly's Eagle PAC other than you?

13 **A. No.**

14 Q. Okay. There's nobody, other than you,  
15 that could have hired SMPS Consulting to provide  
16 services to Phyllis Schlafly's Eagle PAC, correct?

17 **A. Right. You said, "entered into a  
18 contract." I don't know that there was a contract.  
19 There was work done, invoiced to us, and we paid. I  
20 thought you asked about a contract.**

21 Q. You're using the word "we" again, Ed, and  
22 it's just you.

23 **A. Well --**

24 Q. There's no "we."

Edward Martin, Jr.

June 4, 2019

Page 123

1           **A.**     There's a "we" when people, you know,  
2     support a PAC and are in that. So it's -- it  
3     is -- when I use the word "we," you can assume it  
4     means "our."

5           Q.     Does that apply to Eagle Forum PAC? Is it  
6     a one-person, or is it a group of people?

7           **A.**     I'm not sure --

8                   MR. ELSTER: Compound.

9                   THE DEPONENT: I don't understand the  
10    question.

11   BY MR. SOLVERUD

12           Q.     Well, when it comes to Eagle Forum PAC --

13           **A.**     It's a different PAC, right?

14           Q.     Right.

15           **A.**     It's not a super PAC.

16           Q.     Yeah. Is that something that's managed by  
17    multiple people, or is it just managed by one  
18    person?

19                   MR. ELSTER: Objection. Compound,  
20    speculation.

21                   THE DEPONENT: The current Eagle  
22    Forum PAC?

23   BY MR. SOLVERUD

24           Q.     Yeah.

Edward Martin, Jr.

June 4, 2019

Page 124

1           **A.     We'd have to ask John how it's managed.**

2           Q.     Okay. Phyllis Schlafly's Eagle PAC, did  
3     anybody other than you provide services to them?  
4     Let me strike that.

5                     Anybody other than yourself responsible  
6     for managing and operating Phyllis Schlafly's Eagle  
7     PAC?

8           **A.     No.**

9           Q.     So what did you hire SMPS Consulting to  
10    do?

11          **A.     I don't recall the specifics, but it was**  
12    **obviously an outreach, some outreach effort.**

13          Q.     And you paid \$105,000 for something to be  
14    done in September 30th of 2016 that you don't  
15    recall? Is that your testimony?

16          **A.     My testimony is that I'm looking at an**  
17    **invoice for five emails, four million -- five emails**  
18    **to be sent, and I don't recall this invoice and this**  
19    **amount to know, but I'm sure that there are -- you**  
20    **know, there may be -- you may have other documents**  
21    **that show what was sent, or I don't know. But this**  
22    **would have been down the stretch five weeks before**  
23    **the election, making voter contact.**

24          Q.     And where did Phyllis Schlafly's Eagle PAC

Edward Martin, Jr.

June 4, 2019

Page 125

1 get a hundred and five thousand dollars now?

2 **A. I can't recall now, but it must have got a**  
3 **contribution.**

4 Q. Can you identify any contributors to  
5 Phyllis Schlafly's Eagle PAC?

6 **A. At this time?**

7 Q. At any time.

8 **A. I can't recall this time. In the last**  
9 **cycle, we've got some contributions, I think,**  
10 **from -- well, George O'Neill. He gave us some**  
11 **money. But there would have been a record of this.**  
12 **This is a -- this partly is referring it to Heidi,**  
13 **I'm sure, because there's filing required. So**  
14 **there's public record on that.**

15 Q. How much did George O'Neill donate?

16 **A. I can't recall right now.**

17 Q. As of September 2016, can you identify a  
18 single donor to Phyllis Schlafly's Eagle PAC?

19 **A. I can't recall it now, but it's a public**  
20 **record. It's required to be filed, so.**

21 Q. Who prepared those things?

22 **A. Heidi, I believe.**

23 Q. Okay. Why is the bill directed to Phyllis  
24 Schlafly's American Eagles PAC?

Edward Martin, Jr.

June 4, 2019

Page 126

1 MR. ELSTER: Objection. Speculation.

2 THE DEPONENT: I'm not sure I  
3 understand the question.

4 BY MR. SOLVERUD

5 Q. Do you see how the invoice is billed to  
6 Phyllis Schlafly's American Eagle PAC?

7 A. Uh-huh.

8 Q. Why were you sending a check for \$105,000  
9 from Phyllis Schlafly's Eagle PAC to pay a bill to  
10 Phyllis Schlafly's American Eagles PAC?

11 A. Oh, that must have been a typo. I didn't  
12 even see that. This would have been super PAC work.

13 Q. Why is there a typo in the check for  
14 Phyllis Schlafly's Eagle PAC?

15 A. Which typo?

16 Q. Check 1031 at the bottom, it's Phyllis  
17 Schlafly's, and it has a S and an E at the end.

18 A. There was a printing error. Banks. Can't  
19 trust them.

20 Q. That was unintentional?

21 A. Correct.

22 Q. And who managed or who owns that bank  
23 account?

24 A. The Eagle PAC.



Edward Martin, Jr.

June 4, 2019

Page 127

1 Q. And, well, just to be clear, is it Phyllis  
2 Schlafly's Eagle PAC?

3 A. Who owns this PAC? It's owned -- who owns  
4 this bank account is owned by that PAC.

5 Q. And who controls that bank account?

6 A. I do.

7 Q. And does anybody else have access to that  
8 bank account?

9 A. By now it was -- back then or in general?

10 Q. Back then.

11 A. I'm not sure.

12 Q. Now.

13 A. I think John may have access to it. I'm  
14 not sure.

15 Q. So you remain the treasurer of Phyllis  
16 Schlafly's Eagle PAC?

17 A. Yep.

18 Q. But you've given control over the bank  
19 account to somebody else who's not associated with  
20 Phyllis Schlafly's Eagle PAC?

21 A. You asked me individual access. I think  
22 John -- I think he's had access to -- but I'm not  
23 sure what you mean.

24 Q. Does John Schlafly hold any title with

Edward Martin, Jr.

June 4, 2019

Page 128

1 Phyllis Schlafly's Eagle PAC?

2 **A. No.**

3 Q. Does he receive any funds for providing  
4 services to Phyllis Schlafly's Eagle PAC?

5 **A. No.**

6 Q. The PAC that's referred to in Exhibit 59  
7 on behalf -- on whose behalf you wrote a check --

8 **A. Mm-hmm.**

9 Q. -- is it Phyllis Schlafly's Eagle PAC, or  
10 is it Phyllis Schlafly's Eagle Forum PAC?

11 **A. It's Phyllis Schlafly's -- it's Phyllis**  
12 **Schlafly's Eagle PAC.**

13 Q. And have you ever been involved since  
14 September of 2016 with writing checks or approving  
15 the payments on behalf of Phyllis Schlafly's Eagle  
16 Forum PAC?

17 **A. Since what time period?**

18 Q. Since September of 2016.

19 **A. Are you referring to the federal PAC, the**  
20 **longstanding federal PAC?**

21 Q. You're the one who does this work for  
22 these organizations. If you don't understand the  
23 question because you don't know who we're referring  
24 to, that's --

Edward Martin, Jr.

June 4, 2019

Page 129

1           A.     I'm asking you -- okay. If you want  
2     to -- I'm not sure you know what you're asking. I'm  
3     trying to clarify. So if you don't want to clarify  
4     it, I can just say, "I don't know what you're  
5     talking about."

6           Q.     You don't know what you're talking about?

7           A.     Well, it's not clear, so.

8           Q.     That's fine.

9                 Does PSAE have a PAC?

10          A.     No.

11          Q.     Has it ever had a PAC?

12          A.     I don't think so.

13                 (Plaintiff's Exhibit 60, previously  
14     marked, was identified for the record.)

15     BY MR. SOLVERUD

16          Q.     Let me show you a document marked  
17     Exhibit 60. Tell me when you've had a chance to  
18     look at it.

19          A.     Okay.

20          Q.     This is an email exchange between you and  
21     a couple of different individuals, including Ann  
22     Bensman, Roger Schlafly, and then eventually Ray  
23     Wotring on October 17, 2016 correct?

24          A.     Correct.

Edward Martin, Jr.

June 4, 2019

Page 130

1 Q. And on October 17th at 10:09 a.m., you  
2 asked Ann Bensman to send you bank information for  
3 Phyllis Schlafly's American Eagles, and you say,  
4 quote, "We have someone wanting to wire money into  
5 there." Did I read that correctly?

6 A. Correct.

7 Q. Who was wiring money into the Phyllis  
8 Schlafly's American Eagles bank account as of  
9 October 17, 2016?

10 A. I don't recall right now.

11 Q. How would you be able to find that out?

12 A. I'm not sure.

13 Q. As of October 17, 2016, you still claim to  
14 be an employee of Eagle Forum, correct?

15 A. Well, actually, Mr. Sanders was my  
16 attorney at the time for the c4, and he said we were  
17 still employees. So, you're right. You can ask him  
18 about that, but that was the advice of counsel, from  
19 him and Mr. Walsh, was that we were employees, but  
20 we were under this cloud and trying to move forward,  
21 so their advice was . . .

22 Q. So you're not claiming privilege over any  
23 communications with Eagle Forum's lawyers at any  
24 time, are you?

Edward Martin, Jr.

June 4, 2019

Page 131

1           **A. I'm not sure what that means. I'm happy**  
2 **to clarify. I'm not sure what that means.**

3           Q. Well, you're -- I mean, you're just --

4           **A. I'm claiming that --**

5           Q. You just disclosed a communication that  
6 you had with Mr. Sanders.

7           **A. No. I'm disclosing that Mr. Sanders is**  
8 **conflicted in this and everything else we've done,**  
9 **so.**

10          Q. And you're not claiming privilege over any  
11 communications that you had with any attorney that  
12 represented Eagle Forum?

13          **A. I already made a motion claiming that as**  
14 **you know.**

15          Q. Let me finish.

16          **A. No, no.**

17          Q. You need to let me finish my question, and  
18 then you can respond, okay?

19          **A. Okay. Yep.**

20          Q. You understand the rules. You're a  
21 lawyer. You have done this before --

22          **A. Mm-hmm.**

23          Q. -- right? You've done this before?

24          **A. Go ahead. Go ahead, Erik, yeah.**

Edward Martin, Jr.

June 4, 2019

Page 132

1 Q. So you're not claiming privilege over any  
2 communications between you and any attorney  
3 representing Eagle Forum; isn't that right?

4 A. I am --

5 MR. ELSTER: Mischaracterizes his  
6 prior testimony. He said that he was claiming  
7 privilege.

8 THE DEPONENT: I have a motion before  
9 the Court still to be reconsidered, so -- as you  
10 know.

11 BY MR. SOLVERUD

12 Q. I don't know what you're referring to.

13 A. Well, we have -- I'm just describing.  
14 You're asking me --

15 Q. What motion are you referring to?

16 A. Well, we'll take it up later.

17 Q. No, no. I'm asking you in this deposition  
18 what motion are you referring to?

19 A. Well, the fact that the Walsh and Sanders  
20 were in on a lot of our decision making, John and I.  
21 Took money for it. Were in -- we were in the  
22 command group that was deciding this at this time.  
23 Your question was about October 17th, and they  
24 gave us clear indication.

Edward Martin, Jr.

June 4, 2019

Page 133

1                   **Hurry, James. Do you want me to finish**  
2                   **or -- I wasn't finished.**

3                   Q. We didn't stop you.

4                   MR. ELSTER: There's no question  
5                   pending. Refer to the question.

6                   THE DEPONENT: Okay.

7 BY MR. SOLVERUD

8                   Q. Are you done?

9                   A. I'm done.

10                  Q. Okay. What's the motion you're referring  
11                  to?

12                  A. You can talk to my counsel after. I'm not  
13                  sure what -- what I meant there, but we have -- we  
14                  have had this issue before the Court in Illinois.

15                  Q. So you're just confused?

16                  MR. ELSTER: Objection to form.  
17                  Vague.

18 BY MR. SOLVERUD

19                  Q. I think that's what you're saying.

20                  A. Erik, we have this issue.

21                  MR. ELSTER: Mischaracterizes his  
22                  testimony.

23                  THE DEPONENT: We have this issue  
24                  before the Court.

Edward Martin, Jr.

June 4, 2019

Page 134

1 MR. SOLVERUD: Well, he said there's  
2 a motion, and now he can't remember a motion.

3 BY MR. SOLVERUD

4 Q. So either you know the motion, or you  
5 don't know the motion. If you don't know the  
6 motion, then I assume you're confused. So what  
7 motion are you referring to?

8 A. Again, I will say that in a Court in  
9 Illinois, this issue came up. That's all.

10 Q. Okay.

11 A. You can take it up with my attorney.

12 Q. Which attorney would you like me to take  
13 it up with?

14 A. Any of the ones in Illinois.

15 Q. There's -- Ed, there's about 20. Which  
16 attorney would you like me to take it up with?

17 A. We'll get back to you. I'll have my  
18 attorney get back to you, Erik.

19 Q. What monies are you referring to that were  
20 paid to Mr. Sanders?

21 A. We're going down this road?

22 Q. I don't know what you're talking about.

23 A. John Schlafly wrote him a check for -- as  
24 we sat together. And put this on the record? And



Edward Martin, Jr.

June 4, 2019

Page 135

1 John -- to cover, to help pay for the legal fees  
2 that we were doing as the command group of Eagle  
3 Forum c4.

4 Q. Who was the command group?

5 A. Well, John and I. I was the one that  
6 hired the lawyers.

7 Q. Okay.

8 A. As president, as authorized, and John was  
9 a part of that discussion.

10 Q. And who authorized it?

11 A. Well, with -- we've been through this  
12 before. As president, I was authorized to do it.

13 Q. By whom?

14 A. Phyllis.

15 Q. Anybody else?

16 A. The board knew what we were doing, so.

17 Q. You have in front of you Exhibit 60?

18 A. 60.

19 Q. The money that is being wired is to  
20 Phyllis Schlafly's American Eagles. That's what you  
21 wanted to wire, correct?

22 A. That's what this email says, yes.

23 Q. Okay. And on October 17, 2016, you are  
24 responsible for trying to arrange a wire of money

Edward Martin, Jr.

June 4, 2019

Page 136

1 into a Phyllis Schlafly's American Eagles bank  
2 account, correct?

3 **A. This email says that we had a request.**  
4 **So, yes, it looks like it.**

5 Q. All right. And it wasn't the PAC,  
6 correct?

7 **A. I'm not sure what the question is. It**  
8 **wasn't the PAC what?**

9 Q. You weren't trying to wire it into an  
10 account controlled by the PAC, correct?

11 **A. It --**

12 Q. If you could just look at the top of the  
13 email. That's what you said, Ed.

14 **A. Well, I thought you were asking me -- it's**  
15 **for the c4. It looks like that. That's right.**

16 Q. Right. And the c4 is Phyllis Schlafly's  
17 American Eagles, correct?

18 **A. Yes.**

19 Q. Okay.

20 **A. I think so.**

21 Q. And did you at the time disclose anything  
22 to the entire Eagle Forum board of directors about  
23 an individual wanting to wire monies into a c4 bank  
24 account?

Edward Martin, Jr.

June 4, 2019

Page 137

1           **A.     Not if -- I wouldn't have because**  
2           **it's -- they wanted to do it into the Phyllis**  
3           **Schlaflly's American Eagles c4 obviously.**

4           Q.     Okay. And at the time you were still  
5           claiming to be an employee of Eagle Forum, correct?

6           **A.     That was all in the courts. Yes, we were**  
7           **litigating that.**

8           Q.     And this wire, was it ever disclosed to  
9           Eagle Forum?

10          **A.     I have no idea.**

11                   MR. SOLVERUD: Okay. Let me show you  
12           a document marked Exhibit 62.

13                   (Plaintiff's Exhibit 62, previously  
14           marked, was identified for the record.)

15                   MR. ELSTER: You skipped 61?

16                   MR. SOLVERUD: Yeah.

17                   MR. ELSTER: Okay.

18                   MR. SOLVERUD: These have already  
19           been marked in others, so.

20                   THE DEPONENT: Okay.

21           BY MR. SOLVERUD

22           Q.     At the bottom, Bill Wilson writes an email  
23           to you on October 28, 2016. He says, "Ed, I  
24           recommend that Eagle PAC place us on Buzz Feed as

Edward Martin, Jr.

June 4, 2019

Page 138

1 early as possible next week and run through the  
2 election. I am told this will cost no more than  
3 \$5,000. I pledge to you I will find a donor."

4 **A. Mm-hmm.**

5 Q. "I will need your approval, and then we  
6 will push to Heidi to legal compliance." You  
7 respond to this saying, "Okay. Let's do it,"  
8 correct?

9 **A. Yes.**

10 Q. And so what -- what is it that you're  
11 approving on October 28, 2016?

12 **A. I can't tell from the email.**

13 Q. What was it that was going to be placed on  
14 Buzz Feed?

15 **A. I can't tell from the email. It looks  
16 like a video of some kind.**

17 Q. And what is Eagle PAC?

18 **A. Well, I suspect he's referring to the  
19 Phyllis Schlafly Eagle PAC a week before the  
20 election, but that would be why Heidi would be  
21 involved to make sure what we were doing.**

22 Q. And you approved this expenditure without  
23 even having a donor to pay for it; is that right?

24 **A. Well, I think I suspect there was money in**

Edward Martin, Jr.

June 4, 2019

Page 139

1 the bank to cover it. That would be how it would  
2 go. There was other things happening, but I can't  
3 tell from this.

4 Q. And would it be the same bank account  
5 that's referenced or where the check is written out  
6 among Exhibit 59?

7 A. I believe so.

8 Q. Okay. Who is Mr. Manning?

9 A. Rick is -- he's the head of an  
10 organization. The name fails me. And he's  
11 someone -- somewhat of a political consultant, too.

12 Q. And did he provide services to PSAE?

13 A. I don't know if he provided services to  
14 PSAE.

15 (Plaintiff's Exhibit 63, previously  
16 marked, was identified for the record.)

17 BY MR. SOLVERUD

18 Q. Let me show you a document marked  
19 Exhibit 63.

20 A. Okay.

21 Q. Can you identify Exhibit 63 as an email  
22 from Ray Wotring to you on November 1, 2016  
23 forwarding invoices from SPMS Consulting that are  
24 directed to Phyllis Schlafly's American Eagles?

Edward Martin, Jr.

June 4, 2019

Page 140

1           **A.     Yes.**

2           Q.     What services had you engaged SMPS  
3 Consulting to perform for Phyllis Schlafly's  
4 American Eagles that are reflected in this invoice?

5           **A.     It looks like a series of emails according**  
6 **to the invoice.**

7           Q.     Did Phyllis Schlafly's American Eagles pay  
8 \$148,000 to SMPS on or about October 31, 2016?

9           **A.     I don't see that transaction, so I'd have**  
10 **to confirm that, but this is a week before the**  
11 **election, so there's a lot happening, but I assume**  
12 **that happened. I just don't know in front of me.**

13          Q.     Was Phyllis Schlafly's American Eagles  
14 paying to send emails to targeting women married  
15 with kids in Pennsylvania and Colorado in the fall  
16 of 2016?

17          **A.     That's what these invoices -- I think they**  
18 **reflect.**

19          Q.     And the second invoice is a bill for  
20 approximately \$17,744.15 billed to Phyllis  
21 Schlafly's American Eagles on an invoice dated  
22 November 1, 2016, correct?

23          **A.     Hold on. Yes.**

24          Q.     And did you hire SMPS Consulting to send

Edward Martin, Jr.

June 4, 2019

Page 141

1 email targeting women married with kids in Michigan  
2 on or about November of 2016?

3 **A. That's what it looks like it reflects,**  
4 **yes.**

5 Q. And did Phyllis Schlafly's American Eagles  
6 pay \$17,744.15?

7 **A. Again, I don't see the transaction, but I**  
8 **assume if the invoices were properly done, that we**  
9 **did. It's a blur at that point.**

10 (Plaintiff's Exhibit 64, previously  
11 marked, was identified for the record.)

12 **BY MR. SOLVERUD**

13 Q. Let me show you a document marked 64. Who  
14 is Jim Crumley?

15 **A. Jim Crumley is a writer, fundraising**  
16 **letter writer. Maybe that's the best way to**  
17 **describe him.**

18 Q. And did Jim Crumley provide services to  
19 Phyllis Schlafly's American Eagles?

20 **A. Jim Crumley provided services to, I think,**  
21 **all of Phyllis Schlafly's organizations over the**  
22 **years. He was one of her writers.**

23 Q. And did Jim Crumley provide services to  
24 Phyllis Schlafly's American Eagles?

Edward Martin, Jr.

June 4, 2019

Page 142

1           **A.     He provided all of them. That's what I'm**  
2 **saying.**

3           **Q.     I'm not asking about all of them. I'm**  
4 **just trying to find out --**

5           **A.     Well, "all of them" means including that**  
6 **one, but, yes, he did.**

7           **Q.     So the answer is "yes"?**

8           **A.     Yes.**

9           **Q.     Okay. And what's b2one?**

10          **A.     B2one? I don't see that.**

11          **Q.     So you don't know?**

12          **A.     I don't see what -- are you referring to**  
13 **the document still? We're off the document? I**  
14 **don't know. I'm not sure if that's something with**  
15 **Crumley. Oh, it's his email address. I don't know**  
16 **if that's his company.**

17          **Q.     Have you ever heard of a company called**  
18 **"b2one"?**

19          **A.     It's probably his company. I don't know**  
20 **if he bills us directly or how it works, if it's**  
21 **through that company, but probably so, yeah.**

22          **Q.     Has Phyllis Schlafly's American Eagles**  
23 **paid money to Jim Crumley?**

24          **A.     Yeah. I don't recall the exact timing or**



Edward Martin, Jr.

June 4, 2019

Page 143

1 amounts, but I would say, yes, I think so.

2 Q. What services has Jim Crumley provided  
3 specifically to Phyllis Schlafly's American Eagles?

4 A. Jim Crumley is a pretty talented  
5 fundraising letter writer, and Phyllis over the  
6 years either came to trust him or made him into a  
7 better writer, and so he did letters, I think, for  
8 us. It looks like these attachments are letters,  
9 but I'm not sure.

10 Q. Did he ever provide any other services  
11 other than letter writing?

12 A. I'm not sure I know for sure.

13 Q. So Exhibit 64 are draft letters prepared  
14 by Mr. Crumley for your signature on behalf of  
15 Phyllis Schlafly's American Eagles; is that correct?

16 A. That looks like what this is, yes.

17 Q. How many letters did Jim Crumley  
18 ghostwrite for you, Ed?

19 A. Oh, I don't know for sure. I don't think  
20 these are letters, by the way. I think these are  
21 emails, it looks like.

22 Q. Okay.

23 A. Just to be clear.

24 Q. Why is Jim Crumley sending these to Ray

Edward Martin, Jr.

June 4, 2019

Page 144

1 Wotring on November 1, 2016?

2 MR. ELSTER: Objection. Speculation.

3 THE DEPONENT: I'm not sure I know  
4 the answer to that. I mean, one answer -- part of  
5 it might be it's a week before the election, so  
6 there's a lot of things happening, but I'm not sure  
7 why Ray necessarily.

8 BY MR. SOLVERUD

9 Q. Did the Phyllis Schlafly's American Eagles  
10 board of directors approve these emails?

11 A. I don't know that they would have seen  
12 them.

13 Q. Did they approve the engagement of Jim  
14 Crumley?

15 A. Well, when Phyllis was alive as the  
16 chairman, she would have indicated that's what she  
17 wanted us to do. So we would have been continuing  
18 that. And the day-to-day operation of an  
19 organization like that wouldn't have necessarily  
20 risen to seeing the board about every set of emails,  
21 especially in an election cycle so close.

22 Q. Did the Phyllis Schlafly's American Eagles  
23 board ever meet?

24 A. I'm not sure I know the answer to that.

Edward Martin, Jr.

June 4, 2019

Page 145

1 Q. Did it ever have a vote, conduct a vote?

2 A. I think we must have had that. I don't  
3 recall right now.

4 Q. Why do you think that the Phyllis  
5 Schlafly's American Eagles board of directors  
6 conducted a vote?

7 A. I think we had to change the name. There  
8 had to be votes. Again, you're talking about the  
9 board of directors of an entity, which exists  
10 through time, and I think there was at least one or  
11 two votes on changing the -- I just don't know how  
12 we did that.

13 Q. Is there a vote that was taken at a  
14 meeting?

15 A. I don't recall that.

16 Q. Do you recall ever sitting in a meeting  
17 with the entire board of directors of Phyllis  
18 Schlafly's American Eagles?

19 A. I don't think so, but I don't know for  
20 sure.

21 Q. Okay. Do you recall any actions that had  
22 been taken by Phyllis Schlafly's American Eagles,  
23 via corporate resolution vote or otherwise, since  
24 its creation in May of 2016?

Edward Martin, Jr.

June 4, 2019

Page 146

1 MR. ELSTER: Objection. Form,  
2 compound.

3 THE DEPONENT: Well, again, the  
4 organization was -- the entity was created before  
5 that, right? So there were certain actions taken to  
6 change the name.

7 BY MR. SOLVERUD

8 Q. That's why I said, "since May of 2016."

9 A. You said, "since it was created." It  
10 wasn't created -- the name was changed.

11 Q. And I said, "May of 2016."

12 A. But it wasn't created in May of 2016.  
13 That's my point. So my answer --

14 Q. Let me ask a better question for you,  
15 okay?

16 A. Okay.

17 Q. Since May of 2016, has the Phyllis  
18 Schlafly American Eagles board of directors ever  
19 conducted a vote, conducted a meeting or passed any  
20 resolutions?

21 A. I don't recall that. I don't recall the  
22 specifics.

23 Q. How do you, as president, know what to do  
24 if you don't have a meeting with your board of

Edward Martin, Jr.

June 4, 2019

Page 147

1 directors?

2 A. Well, while Phyllis was alive, she gave us  
3 direction. So that would be the first thing.

4 And then one of the challenges since  
5 Phyllis has been gone is to figure out how to keep  
6 going in the direction she wants. So some of that  
7 is to talk to the chairman. Some of it is to talk  
8 to the board members. Some of it is to talk to  
9 John. Some of it is to talk to other leaders in the  
10 sort of what happens after a -- you know, after a  
11 death of such a dominant leader. So we do a lot of  
12 those things.

13 Q. Since September 5, 2016, what meetings  
14 have been conducted by Phyllis Schlafly's American  
15 Eagles?

16 A. I don't know that -- what meetings there  
17 were. I don't know. I don't recall any. I don't  
18 recall what the specifics would be.

19 Q. What guidance have you gotten from the  
20 Phyllis Schlafly's American Eagles board of  
21 directors since September 5, 2016?

22 A. Just probably consultation is the best  
23 way -- individually with Kathleen and John or -- is  
24 John on that board? I forget now.

Edward Martin, Jr.

June 4, 2019

Page 148

1 Q. Do you know whether John is on the board?

2 A. I don't think he is on that board, but  
3 John would be the best I can get without Phyllis  
4 being here, and I don't channel Phyllis. So I  
5 would -- that would be how we would do that. And,  
6 again, that was -- the challenge for us is that was  
7 the practice of -- with Phyllis alive. So it's a  
8 challenge to do, to adjust.

9 (Plaintiff's Exhibit 65, previously  
10 marked, was identified for the record.)

11 BY MR. SOLVERUD

12 Q. I'll show you a document marked as  
13 Exhibit 65. This is an email from Ray Wotring to  
14 you and Heidi dated November 4, 2016, correct?

15 A. Yes.

16 Q. What, if any, disclosures was there to  
17 anybody outside of yourself, Heidi, Ray Wotring of  
18 these -- you sending out these types of  
19 communications on behalf of Phyllis Schlafly's Eagle  
20 PAC?

21 MR. ELSTER: Disclosures to who? To  
22 anybody?

23 MR. SOLVERUD: To anyone.

24 MR. ELSTER: Okay.

Edward Martin, Jr.

June 4, 2019

Page 149

1 THE DEPONENT: I can't recall that  
2 now. I'm not sure. This is the Eagle PAC, so this  
3 is going five days before the election. I'm not  
4 sure. I think this was the one that had -- the  
5 video has to do with military. I'm not sure who I  
6 would have consulted with.

7 BY MR. SOLVERUD

8 Q. With respect to Exhibit 64 --

9 A. Mm-hmm.

10 Q. -- did you consult with anybody on the  
11 Eagle -- on the Phyllis Schlafly's American Eagle  
12 board of directors before those emails were sent  
13 out?

14 A. Again, I can't recall. At that time,  
15 there's lots of conversations with people like  
16 Kathleen and Andy and others, but I don't recall it  
17 right now.

18 Q. Okay.

19 A. John.

20 (Plaintiff's Exhibit 66, previously  
21 marked, was identified for the record.)

22 BY MR. SOLVERUD

23 Q. Let me show you what's been marked as  
24 Exhibit 66.

Edward Martin, Jr.

June 4, 2019

Page 150

1           **A.     Okay.**

2           Q.     And you wouldn't have been consulting with  
3     John because you didn't even think he was on the  
4     board?

5           **A.     I'm sorry.**

6           Q.     You wouldn't have been consulting with  
7     John because you didn't think he was on the board of  
8     PSAE at the time, correct?

9                     MR. ELSTER: Objection. Foundation.

10                    THE DEPONENT: No. I think, as I've  
11     said maybe more than you want to hear or maybe than  
12     he wants to hear, the one person I consult with more  
13     than anyone else is John. So if he's on the board  
14     or not, I talk to John.

15     BY MR. SOLVERUD

16           Q.     Okay.

17           **A.     And again, so.**

18           Q.     And Exhibit 66 is another email exchange  
19     between you, Ray, and Heidi regarding another email  
20     to go out under your signature as president of  
21     Phyllis Schlafly's American Eagles PAC, correct?

22           **A.     Yes.**

23           Q.     When did you become president of Phyllis  
24     Schlafly's American Eagles PAC?



Edward Martin, Jr.

June 4, 2019

Page 151

1           A.     Well, that's -- it looks like that's a  
2     typo again in error because this is the super PAC.  
3     So I'm not sure if we did that -- we caught that,  
4     but that's the super PAC, so.

5           Q.     Well, you see up above on this, it's got a  
6     reference to PSAEPAC 2214? Do you see that?

7           A.     I'm sorry. No, I don't.

8           Q.     Up at the very top.

9           A.     PSAE? Yeah. That's an error.

10          Q.     Okay.

11          A.     Because the reason -- and the reason you  
12     can know is this is why we have these high-priced  
13     lawyers. Heidi Abegg would be approving this. We  
14     wouldn't do anything that was -- I think this was  
15     super PAC. I'm not -- I guess I'm -- if it wasn't  
16     then, she made sure, but I don't know how it could  
17     be.

18          Q.     It says it was -- the draft says it was  
19     paid for by Phyllis Schlafly's American Eagles PAC,  
20     correct?

21          A.     Yeah, that's what the draft says.

22          Q.     What is Phyllis Schlafly's American Eagle  
23     PAC?

24          A.     I don't think such a thing exists.

Edward Martin, Jr.

June 4, 2019

Page 152

1 Q. Did it ever exist?

2 A. No.

3 Q. Has there ever been an entity known as  
4 Phyllis Schlafly's American Eagles PAC?

5 A. I don't think so, unless this is some  
6 problem with the super PAC naming. I don't think  
7 there was one that existed. I'm not sure.

8 (Plaintiff's Exhibit 67, previously  
9 marked, was identified for the record.)

10 BY MR. SOLVERUD

11 Q. Let me show you a document marked  
12 Exhibit 67.

13 A. Okay.

14 Q. Tell me when you've seen it.

15 A. Okay.

16 Q. And this document includes Bill Wilson  
17 forwarding you an invoice from SMPS Consulting,  
18 dated November 4, 2016, directed to Phyllis  
19 Schlafly's American Eagles to pay \$28,000 for emails  
20 sent to approximately 200,000 people in the Fourth  
21 Congressional District of Virginia, correct?

22 A. Yes.

23 Q. Is this paid for by Phyllis Schlafly's  
24 American Eagles?

Edward Martin, Jr.

June 4, 2019

Page 153

1           **A. I think this was the super PAC again. I**  
2           **think we have some names that are off on this.**

3           Q. Why would a bill be directed to Phyllis  
4           Schlafly's American Eagles if it was intended for  
5           the super PAC?

6                       MR. ELSTER: Objection. Speculation.

7                       THE DEPONENT: Yeah, I don't know.

8           BY MR. SOLVERUD

9           Q. What did you do to make sure that vendors  
10          of Phyllis Schlafly's American Eagles were not  
11          sending bills to the wrong entities?

12          **A. Well, whenever -- obviously we try to make**  
13          **that clear. So I'm not sure when that happened,**  
14          **but, again, we'd have to fix that as soon as we**  
15          **could, and make sure we're spending the right -- the**  
16          **right things.**

17          Q. You're saying "we" again, but I'm asking  
18          you what you did.

19          **A. Well, I'm saying "we" because there's a**  
20          **lawyer involved and these vendors that are involved.**  
21          **So it's not only one "we," meaning "we" make that**  
22          **clear, so.**

23          Q. Right. But just so you know, for purposes  
24          of this deposition, when I ask you what you did, I'm

Edward Martin, Jr.

June 4, 2019

Page 154

1 only asking what you did. I'm not asking what Heidi  
2 Abegg or somebody else may have done.

3 **A. Sure.**

4 Q. That gets into issues like hearsay, and  
5 you can only testify as to what you did.

6 **A. Yep.**

7 Q. So what, if anything, did you do?

8 **A. I made sure that we corrected it whenever**  
9 **we saw it.**

10 Q. And "we" is who?

11 **A. Whoever was helping me do this, whether it**  
12 **was consultants or --**

13 Q. Who was helping you do this?

14 **A. Well, in this, there's exchange with Ray**  
15 **and Bill, and I don't know if Heidi was on another**  
16 **one, but that would be the kinds of people that I**  
17 **would rely on to help.**

18 Q. Did John wire money from the PAC to pay  
19 this bill?

20 **A. I don't know.**

21 Q. And as of November 4, 2016, who was the  
22 treasurer of the super PAC?

23 **A. I assume it was me. I don't think it was**  
24 **anybody else, but . . .**

Edward Martin, Jr.

June 4, 2019

Page 155

1                   (Exhibit 69, previously marked, was  
2                   identified for the record.)

3                   BY MR. SOLVERUD

4                   Q.     Let me show you a document marked  
5                   Exhibit 69. Well, hold on. Give me -- that's mine.  
6                   It's got highlighting. That's yours.

7                             Let me know when you've had a chance to  
8                   look at it.

9                   A.     Okay.

10                  Q.     On November 14, 2016, Ray Wotring  
11                  forwarded to you invoices from Jim Crumley at b2one  
12                  that are directed to Phyllis Schlafly's American  
13                  Eagles PAC, correct?

14                  A.     Mm-hmm, yes.

15                  Q.     The first invoice is dated October 19,  
16                  2016. It's for \$300, and the description is Utah.

17                  A.     Mm-hmm.

18                             MR. ELSTER: Objection. It's 900.

19                             MR. SOLVERUD: I'm sorry. Yeah.

20                  You're right.

21                  BY MR. SOLVERUD

22                  Q.     The rate was 300. The first invoice is  
23                  number 1312. It's for a total of \$900, and the  
24                  description is Utah.

Edward Martin, Jr.

June 4, 2019

Page 156

1 A. Mm-hmm.

2 Q. Is that a "yes"?

3 A. I'm sorry. Yes.

4 Q. And what was being done in Utah that you  
5 were paying for?

6 A. My recollection is this was a  
7 McMullin -- Evan McMullin was running as a third  
8 party candidate. So we were trying -- I think we  
9 had a poster campaign as well as something else in  
10 Utah, and so this would have been the super PAC  
11 activity. And I guess I'm guessing on that Utah,  
12 but that was the -- this is two weeks before the  
13 election. So when these invoices are, that's about  
14 right.

15 Q. And the bill was made out to Phyllis  
16 Schlafly's American Eagles PAC?

17 A. Yeah. It looks like that's too frequent  
18 an error, but that kind of expenditure, I don't  
19 think that was a c4 expenditure.

20 Q. Why don't -- why do you not think that  
21 that was a c4 expenditure?

22 A. My recollection of those invoices, I guess  
23 I am recalling, and I might have to refresh on what  
24 that was, but I think that was more

Edward Martin, Jr.

June 4, 2019

Page 157

1 specifically -- I guess I'm not sure. I thought  
2 they might be more specifically super PAC kinds of  
3 things because it's so close to the election, but I  
4 guess I'm not sure. We'll have to see.

5 Q. Would it have been a proper c4  
6 expenditure?

7 A. It depends on what it was. Again, these  
8 invoices are pretty broad.

9 Q. Based on what you describe, this poster  
10 campaign, would that have been a c4 expenditure?

11 A. I can't recall the specifics. I think we  
12 did it as a super PAC, but I can't recall. Some of  
13 it can be. Some of it, but you have to be careful.  
14 Again, that's why I have lawyers and John.

15 Q. Well, sometimes you have lawyers and John,  
16 so you can throw those people under the bus if it  
17 comes back to you. I mean --

18 MR. ELSTER: Objection.

19 THE DEPONENT: I never did that to  
20 Sanders.

21 BY MR. SOLVERUD

22 Q. The second invoice is dated 1316.

23 A. Second invoice is -- yep.

24 Q. And I said, "dated 1316." It's numbered

Edward Martin, Jr.

June 4, 2019

Page 158

1 1316, correct?

2 **A. Correct.**

3 Q. That's, again, directed to Phyllis  
4 Schlafly's American Eagles, correct?

5 **A. Right.**

6 Q. And that's for \$900 for three public  
7 safety emails?

8 **A. \$900 for -- I'm sorry. For what?**

9 Q. Three public safety emails.

10 **A. Yep.**

11 Q. What were those?

12 **A. I'm not sure I know right now. I'd have  
13 to try to figure that out.**

14 Q. And did Phyllis Schlafly's American Eagles  
15 pay for that?

16 **A. I'd have to clarify. I think these were  
17 super PAC, but I'm -- the timing is difficult  
18 because it's right before the election, and I don't  
19 think we were -- I think that's a mistake in these  
20 invoices, but I'm not certain. You could refresh my  
21 recollection if there's other documents. I don't  
22 know.**

23 Q. The third invoice is another invoice from  
24 SMPS Consulting directed to Phyllis Schlafly's



Edward Martin, Jr.

June 4, 2019

Page 159

1 American Eagles, and it's for \$3,000, right?

2 **A. Yep.**

3 Q. And what did SMPS Consulting do for  
4 Phyllis Schlafly's American Eagles in about November  
5 of 2016?

6 **A. I think that's an error in attribution of**  
7 **who to bill for. I think it was the PAC that was**  
8 **doing that, but I'd have to go back and try to look.**

9 MR. ELSTER: I need a break for  
10 lunch, Erik. I've got past noon.

11 MR. SOLVERUD: I've got, like, four  
12 documents in this.

13 THE DEPONENT: Okay.

14 MR. ELSTER: Are you good?

15 THE DEPONENT: It's a good time.  
16 That means we're done completely? Just kidding.

17 MR. SOLVERUD: I knew you were  
18 kidding.

19 THE DEPONENT: I thought that's what  
20 he meant.

21 (Plaintiff's Exhibit 70, previously  
22 marked, was identified for the record.)

23 BY MR. SOLVERUD

24 Q. I'll show you a document marked

Edward Martin, Jr.

June 4, 2019

Page 160

1 Exhibit 70. Let me know when you've had a chance to  
2 look at this.

3 **A. Okay.**

4 Q. And on January 17, 2017, Bill Wilson  
5 suggests that you buy a website or domain name,  
6 TrumpTru.com; is that right?

7 **A. That's what his email says, yes.**

8 Q. And you say, "Is it an Eagle Forum project  
9 or c3," right?

10 **A. Yes.**

11 Q. And what did you mean by "Is it an Eagle  
12 Forum project?"

13 **A. I'm not sure I remember. That's a funny  
14 phrase. I don't know.**

15 Q. And he tells you to "Expense it c3, but  
16 make it an expense." Do you see that?

17 **A. Yeah. He says, "Expense it c3, but make  
18 it an expense." By the way, what that is, Eagle  
19 Forum c3, we, as you know, use the term "Eagle  
20 Forum" for our education and legal defense fund as  
21 opposed to, I think now, looking at it, whether  
22 there was a c4 or the super PAC, I don't know.  
23 Consultants have lots of ideas, so. But "Expense it  
24 c3, but make it an expense," I don't know what that**

Edward Martin, Jr.

June 4, 2019

Page 161

1 means.

2 Q. Okay. Was that done?

3 A. I don't recall.

4 Q. Did you ever authorize anybody to purchase  
5 TrumpTru.com?

6 A. I don't recall that.

7 Q. Do you have any knowledge about whether  
8 anybody ever purchased TrumpTru.com?

9 A. Right now I can't -- I  
10 can't -- consultants have lots of ideas, and so I  
11 don't know if this one went forward at all, but so I  
12 don't know. I'd have to -- maybe there's things  
13 that can refresh that memory, but I don't know. I  
14 don't think so.

15 (Plaintiff's Exhibit 76, previously  
16 marked, was identified for the record.)

17 BY MR. SOLVERUD

18 Q. Let me show you a document marked Exhibit  
19 76. Let me know when you're done looking at it.

20 A. Okay.

21 Q. Who was Bill Wilson?

22 A. Consultant.

23 Q. And what services did he provide to -- I  
24 asked Bill Wilson. I meant Bill Hillman. Who is

Edward Martin, Jr.

June 4, 2019

Page 162

1 Bill Hillman?

2 A. Bill Hillman, I guess, is a consultant,  
3 too. He works with different political and policy  
4 efforts.

5 Q. What services did he provide to Phyllis  
6 Schlafly's American Eagles?

7 A. He kind of helped us with some grassroot  
8 organizing is the best way to describe it maybe.

9 Q. Where?

10 A. Pennsylvania and maybe for a period in  
11 maybe other -- maybe Pennsylvania. I was going to  
12 say Illinois, but I think Pennsylvania.

13 Q. Do you recall the name of the -- do you  
14 have a name for the project that you worked on with  
15 Bill Hillman in Pennsylvania?

16 A. I don't recall. I think it had a few  
17 names at various times, so I don't know.

18 Q. What were the names that you recall?

19 A. I don't remember them. That's what I  
20 mean. I don't know for sure.

21 Q. And that was in an effort to oppose the  
22 election of Dent; is that right?

23 A. No.

24 Q. No?

Edward Martin, Jr.

June 4, 2019

Page 163

1           **A.     No.**

2           Q.     Well, what was the project in  
3     Pennsylvania?

4           **A.     It was organizing grassroots support of**  
5     **Trump in -- with an eye to making sure that all the**  
6     **congressional delegation, but especially the**  
7     **Republicans noticed, but it wasn't limited to Dent,**  
8     **and it wasn't only about his election. It was about**  
9     **the Trump issues.**

10          Q.     And on July 7, 2017, Bill Wilson sends an  
11     email to you and Bill Hillman about a website  
12     project?

13          **A.     Mm-hmm.**

14          Q.     Right? Do you recall what you wanted to  
15     do?

16          **A.     From this email or in general? I don't**  
17     **recall what he -- consultants have lots of ideas, so**  
18     **I'm not sure if this was an idea that was in the**  
19     **early stages or later. I'm not sure.**

20          Q.     He says, "But there needs to be a  
21     prominent link to a c4 page that is Phyllis  
22     Schlafly's American Eagles that goes after the four  
23     targets by name. Demand these punks drop their  
24     anti-Trump, anti-American positions, and start

Edward Martin, Jr.

June 4, 2019

Page 164

1 voting to support the president." Do you see that?

2 A. Yes.

3 Q. Who are the four targets?

4 A. I don't recall right now. I think there  
5 were more. At various times, there were more than  
6 four. This is his email. I'm not sure. Bill might  
7 have a better sense.

8 Q. Did you have any understanding as to who  
9 the four targets were when you received this email  
10 on July 7, 2017?

11 A. I don't recall the specifics of which  
12 ones. Again, I think there were more at a certain  
13 point, but were there more -- again, more places we  
14 wanted to make the argument. Bill was focused on  
15 people, and I think we wanted to make -- we have an  
16 interest in making sure Pennsylvania goes right.

17 Q. And were -- was this done?

18 A. Was this done?

19 Q. Yes.

20 A. I don't think that this was done, but I  
21 think we did do some things in Pennsylvania, yes.

22 Q. Did Phyllis Schlafly's American Eagles  
23 ever expend any monies on a project in Pennsylvania?

24 A. Yes.

Edward Martin, Jr.

June 4, 2019

Page 165

1 Q. And did Phyllis Schlafly's American Eagles  
2 ever pay for any expenses to oppose the election of  
3 Dent in Pennsylvania?

4 A. That's -- that's not how I would  
5 characterize what we did.

6 Q. Because that would be illegal?

7 A. No, I don't know about that. I'd have to  
8 ask John and our lawyers, but I think you can  
9 be -- you can advocate in lots of ways on c4 even  
10 about elections and issues, but you have to be  
11 careful about it, and we always are.

12 Q. Who is Mark Lloyd?

13 A. Mark Lloyd is the Bill Hillman of  
14 Illinois.

15 Q. Okay. And what was the project in  
16 Illinois?

17 A. It was a similar idea to try to get the  
18 issue to Trump issues and do a rally and highlight  
19 the issues. Little different scope, little  
20 different set of people, and I'm not too sure on the  
21 details.

22 Q. Did Phyllis Schlafly's American Eagles  
23 ever pay any expenses to establish any websites in  
24 connection with projects for either Bill Wilson,

Edward Martin, Jr.

June 4, 2019

Page 166

1 Mr. Hillman, or Mark Lloyd?

2 **A. I don't recall that.**

3 THE DEPONENT: I am going to have to  
4 go to the restroom.

5 MR. SOLVERUD: Do you need to go  
6 right now?

7 THE DEPONENT: I may have. I'm  
8 getting there.

9 (Plaintiff's Exhibit 82 was marked for  
10 identification.)

11 BY MR. SOLVERUD

12 Q. Let me show you a document marked Exhibit  
13 Number 82. Let me know when you've seen it.

14 **A. I'm ready.**

15 Q. This refers to an invoice for websites?

16 **A. This refers to a -- the subject is an**  
17 **invoice of -- yes, I think.**

18 Q. Okay. It says, "John has a check" -- "Ed,  
19 while John has the checkbook out, can this get paid  
20 today?" Was John responsible for paying expenses on  
21 behalf of Phyllis Schlafly's American Eagles?

22 **A. I'm sorry. I'm trying to see**  
23 **what -- there is no attachment, right?**

24 Q. That's correct.



Edward Martin, Jr.

June 4, 2019

Page 167

1           **A.     This refers to -- okay. I'm sorry. The**  
2 **question again?**

3                   MR. SOLVERUD:   Go ahead.

4                   THE REPORTER:   "Was John responsible  
5 for paying expenses on behalf of Phyllis Schlafly's  
6 American Eagles?"

7                   THE DEPONENT:   I would say  
8 responsible is, you know, wasn't -- I was the one  
9 that had to do it, but John would be the one that  
10 would make sure we, you know, wrote checks and  
11 things. So "responsible" is maybe a bit more, but  
12 he would be in the loop, but the way this -- I'm not  
13 sure what this is referring to is the question.

14 BY MR. SOLVERUD

15           Q.     Okay. It says, "What websites are they  
16 for?" And you respond, "The site" -- or you ask  
17 that question, and Bill Wilson responds, "The site  
18 on issues and the site for c4 to get people to take  
19 action."

20           **A.     Mm-hmm.**

21           Q.     Do you know what c4 is being referred to  
22 there?

23           **A.     I -- I don't know for sure, but I assume**  
24 **it's Phyllis Schlafly American Eagles, but I don't**

Edward Martin, Jr.

June 4, 2019

Page 168

1 **know.**

2  
3 (Plaintiff's Exhibit 83 was marked for  
4 identification.)

5 BY MR. SOLVERUD

6 Q. Let me show you Exhibit 83. This is an  
7 email exchange between you and Bill Hillman and  
8 others related to Mark Lloyd's expenses for  
9 Allentown?

10 **A. Mm-hmm.**

11 Q. And were the expenses for Allentown paid  
12 for by Phyllis Schlafly's American Eagles?

13 **A. Yes.**

14 Q. Were the expenses for Illinois paid for by  
15 Phyllis Schlafly's American Eagles?

16 **A. Yes, I believe so. I'm not sure on that,**  
17 **but let me clarify. I'm not seeing it on this. I'm**  
18 **just not sure on what all those expenses were, but I**  
19 **think so.**

20 Q. Okay. And Bill Hillman asked, "Can I run  
21 these through the credit card for him?" And you  
22 respond, "I think I maxed the card out today.  
23 Paying it tomorrow, I think." What credit card are  
24 you referring to?

Edward Martin, Jr.

June 4, 2019

Page 169

1           A.     I -- when I began working with Phyllis, I  
2     had a credit card that was used across the  
3     organization -- well, I guess when I became  
4     president, across the organization. So we have  
5     since, I think, got new ones that are more clearly  
6     demarcated, but that's the sort of organizational  
7     credit card. We used to call it an "Eagle Forum  
8     credit card." We call it an "EFELDF credit card,"  
9     but it's really a credit card that allows, if we  
10    need to charge something, to be able to get it paid,  
11    and then figure out how to allocate the payment from  
12    the credit cards. It's another one of John's tasks.

13           Q.    As of September 14 --

14           A.    Huh-uh.

15           Q.    -- 2017, were you using the original  
16    credit card that you had received when you came  
17    onboard, or were you using some new credit card?

18           A.    I'm not -- I don't recall the timing of  
19    that.

20                   MR. SOLVERUD: Okay. And then the  
21    last document before the break?

22                   MR. ELSTER: Okay.

23                   (Plaintiff's Exhibit 84 was marked for  
24    identification.)

Edward Martin, Jr.

June 4, 2019

Page 170

1 BY MR. SOLVERUD

2 Q. Let me show you a document marked  
3 Exhibit 84.

4 A. Mm-hmm.

5 Q. This includes an invoice from Gunston  
6 Analytic Partners directed to Phyllis Schlafly's  
7 American Eagles for the website design project,  
8 Illinois?

9 A. Mm-hmm.

10 Q. Gunston Analytic Partners is part of the  
11 Bill Wilson group of entities, correct?

12 A. I'm not sure what that means. I think  
13 it's someone he works with, yes.

14 Q. Okay. And what were -- what were you  
15 paying for in connection with the website -- website  
16 design, Illinois project?

17 A. I don't recall this specifically now to  
18 know. I mean, I could be refreshed. I think we  
19 did -- maybe we did put up a website that we drove  
20 people towards when we sent out a lot of emails, but  
21 I don't really -- it escapes me right now what that  
22 was.

23 Q. And this was paid through the same credit  
24 card that the -- that we were talking about with

Edward Martin, Jr.

June 4, 2019

Page 171

1 respect to Exhibit 83, correct?

2 A. I think so or -- I think so.

3 Q. And that's an Amex card; am I right?

4 A. Well, I referred earlier to a different  
5 one. There's a Visa. There have been two cards,  
6 and an Amex and a Visa over the years. So I'm not  
7 sure.

8 Q. And whose name is the Amex card that's  
9 referred to in Exhibit 84?

10 A. Now I'm not sure. It was -- when Phyllis  
11 was alive, it was Phyllis' name, and so I -- whose  
12 name it's in? I'm not sure whose name it's in.

13 Q. And who paid the expense that's reflected  
14 in Exhibit 84?

15 A. I believe it's Phyllis Schlafly's American  
16 Eagles, but I'd have to confirm that.

17 MR. SOLVERUD: Okay. All right.  
18 Break for lunch.

19 THE VIDEOGRAPHER: We're off the  
20 record at 12:20 p.m.

21 (Whereby a lunch break was taken.)

22 THE VIDEOGRAPHER: We are back on the  
23 record at 11:35 p.m -- I'm sorry -- 1:35 p.m.

24 / / /

Edward Martin, Jr.

June 4, 2019

Page 172

1 BY MR. SOLVERUD

2 Q. Ed, where do you live currently?

3 A. Virginia.

4 Q. And address?

5 A. 10017 Park Royal Drive, Great Falls,  
6 Virginia 20026.

7 Q. And have you ever been a party to a  
8 lawsuit other than the lawsuits involving Eagle  
9 Forum?

10 A. Yes.

11 Q. What lawsuits have you been a party to?

12 A. I don't know the list of them. I'd have  
13 to go back and look. One with the State of  
14 Missouri, and I guess that's all I can think of now,  
15 but I'm sure there's . . .

16 Q. You earned a law degree from SLU in 1998,  
17 right?

18 A. Yes, sir.

19 Q. And undergrad, Holy Cross?

20 A. College of the Holy Cross, yes, sir.

21 Q. What year?

22 A. 1992.

23 Q. What was your degree in?

24 A. A bachelor's of arts, English literature,

Edward Martin, Jr.

June 4, 2019

Page 173

1     **and a peace and conflict studies concentration.**

2           Q.     And you're admitted to practice in  
3     Missouri still?

4           **A.     I am admitted to practice in Missouri.**

5           Q.     Are you also admitted to practice in the  
6     District of Columbia?

7           **A.     Yes, sir.**

8           Q.     What years were you admitted to practice  
9     in Missouri?

10          **A.     I believe that was '98, and I'm not**  
11     **certain of the year in D.C.**

12          Q.     And so you're currently a member of both  
13     the Missouri bar and the District of Columbia bars,  
14     correct?

15          **A.     Yes, sir.**

16          Q.     And what did you do right out of law  
17     school?

18          **A.     I was the director of the human rights**  
19     **office for the Archdiocese of St. Louis.**

20          Q.     And you did that until 2002; is that  
21     right?

22          **A.     Until May or June of 2001.**

23          Q.     Okay. And what did you do in 2001?

24          **A.     Then I clerked for the Federal Court of**

Edward Martin, Jr.

June 4, 2019

Page 174

1 **Appeals for the Eighth Circuit, Judge Pasco Bowman**  
2 **in Kansas City.**

3 Q. Okay. And then you ended up joining Bryan  
4 Cave?

5 **A. Bryan Cave, yep.**

6 Q. From 2002 to 2004?

7 **A. Approximately, yes.**

8 Q. And what did you do after Bryan Cave?

9 **A. Started my own practice.**

10 Q. And how long did you have your own private  
11 practice?

12 **A. In 2004 until 2006. I'm not sure what**  
13 **time in '06 when I went to work for the State of**  
14 **Missouri.**

15 Q. And did you handle any certain types of  
16 cases, or what type of work did you do in private  
17 practice?

18 **A. So it was a startup practice. I handled a**  
19 **little bit of everything.**

20 Q. Okay. And in 2006, you were chief of  
21 staff for Governor Blunt; is that right?

22 **A. Correct. September of 2006.**

23 Q. And how long did you do that?

24 **A. Until January of 2008.**



Edward Martin, Jr.

June 4, 2019

Page 175

1 Q. And what did you do in January of 2008?

2 **A. Back to practicing law.**

3 Q. And how long were you back in private  
4 practice for?

5 **A. Well, 2015 or so.**

6 Q. And when you returned to private practice  
7 from 2008 to 2015 or so, did you do any specific  
8 kinds of work or specialize in any --

9 **A. I think I had done beforehand some**  
10 **pro bono litigation for pro-life, and I picked up**  
11 **some of that, but, again, I started a practice, so I**  
12 **did a little bit of a lot.**

13 Q. Okay.

14 **A. I mean, I did a little bit of not enough,**  
15 **but wanted to be a lot.**

16 Q. When did you begin working for Eagle  
17 Forum?

18 **A. After I was elected to the Republican**  
19 **Party Chairman in Missouri. So early in 20 --**

20 Q. 2013?

21 **A. -- 13. Early in 2013, yes.**

22 Q. Okay. And when you started working for  
23 Eagle Forum, were you paid a salary or compensation  
24 from Eagle Forum?

Edward Martin, Jr.

June 4, 2019

Page 176

1           **A.     I was paid a salary from Eagle -- Eagle**  
2           **Forum Education and Legal Defense Fund.**

3           Q.     Okay. When did you first start earning a  
4           salary from Eagle Forum?

5           **A.     When I became president of the**  
6           **organizations.**

7           Q.     And at that point in time when you claimed  
8           to be president of Eagle Forum, you also became an  
9           employee, correct?

10          **A.     I don't know how that's -- to define that.**  
11          **I still was continuing to finish up some legal work,**  
12          **and I kept my practice open, but -- and so I don't**  
13          **know what -- how to answer that. I was -- it was**  
14          **full-time work between the two organizations.**

15          Q.     What do you consider to be your start date  
16          and your end dates of your employment with Eagle  
17          Forum specifically?

18          **A.     Eagle Forum c4?**

19          Q.     Yes, sir.

20          **A.     I guess I'd have to look back to make sure**  
21          **they're specific. I'm not sure how to answer that.**  
22          **I guess -- I guess January of 2015.**

23          Q.     Okay.

24          **A.     Through whatever the Court says -- said**

Edward Martin, Jr.

June 4, 2019

Page 177

1     **so.**

2           Q.     Okay.   So that 1020 order?

3           **A.     Yeah, I think so.   I mean, again, I'd have**  
4     **to look back.   I'm not sure if there's something I'm**  
5     **missing on the specifics of what that means, but I**  
6     **think that's about the range.**

7           Q.     And in 2016, what was your salary from  
8     Eagle Forum?

9           **A.     I don't recall.**

10          Q.     In 2016, you were also employed by EFELDF;  
11     is that right?

12          **A.     2016?**

13          Q.     Yes.

14          **A.     Yes.**

15          Q.     Okay.   And what was your salary from  
16     EFELDF?

17          **A.     I don't recall the specifics of it.**

18          Q.     Do you recall that in 2016, you were being  
19     paid a total of \$150,000 with 75,000 being paid by  
20     Eagle Forum and 75,000 being paid by EFELDF?

21          **A.     It sounds right, but as I said to you, I**  
22     **don't recall the specifics of it right now.**

23          Q.     Okay.   And you understood that EFELDF was  
24     a c3 organization, right?

Edward Martin, Jr.

June 4, 2019

Page 178

1           **A.     Yes.**

2           Q.     And you understood that as a c3, there  
3     were certain restrictions on its activities, right?

4                     MR. ELSTER:  Objection.  Vague.

5                     THE DEPONENT:  Yes.

6     BY MR. SOLVERUD

7           Q.     Okay.  EFELDF did not have any members,  
8     correct?

9           **A.     I don't know what that means.**

10          Q.     Well, did EFELDF have any members?

11          **A.     I'm not sure how that's defined.  I think**  
12       **that's one of the conversations that has been**  
13       **ongoing, how you define the members, so I think I'd**  
14       **defer that question.  I just don't know for sure.**  
15       **All of -- when Phyllis was alive, the description of**  
16       **who her Eagles were fell into a broad category of**  
17       **folks, so.**

18          Q.     Was EFELDF a membership organization?

19          **A.     I'm not sure.  I'm not sure I have a good**  
20       **sense of that answer.  I don't think we collected**  
21       **membership dues, but there was a way that people**  
22       **were connected to us.  I'm just not sure.  It was as**  
23       **Phyllis had wanted.**

24          Q.     Did EFELDF maintain any membership lists?

Edward Martin, Jr.

June 4, 2019

Page 179

1 A. EFELDF or c4?

2 Q. EFELDF.

3 A. Any of the lists of people who were  
4 affiliated with us were maintained by Phyllis and in  
5 her Eagle Trust.

6 Q. So is the answer "no"?

7 A. Well, I think Phyllis would describe how  
8 she would say who was affiliated with EFELDF. So we  
9 had people that were affiliated with Phyllis, and  
10 I'm not sure how -- whether they would be described  
11 as members.

12 Q. Does EFELDF have any members currently?

13 A. We sort of have our people come towards us  
14 in lots of different ways, so I don't know if we  
15 describe members. We don't have people that have a  
16 membership, specific membership plan, I guess,  
17 that's clearly defined. We have membership  
18 subscription stuff that works, and it's kind of an  
19 ongoing -- it's been a challenge.

20 Q. Does EFELDF receive membership dues from  
21 anybody?

22 A. You'd have to ask John.

23 Q. You don't know?

24 A. I have a sense of people

Edward Martin, Jr.

June 4, 2019

Page 180

1 being -- subscribing and things, but I think that's  
2 a better question for -- that's not my . . .

3 Q. So do you know whether -- do you know  
4 whether EFELDF collects membership dues?

5 A. I know we have people that pay for  
6 subscriptions. I don't think we call them  
7 "membership dues."

8 Q. Okay. And what is it your understanding  
9 of people pay for subscriptions for EFELDF -- to  
10 EFELDF?

11 A. Well, they -- people pay for -- to join to  
12 get subscriptions of The Phyllis Schlafly Report.

13 Q. Okay. And is it your testimony that there  
14 are people that pay EFELDF to get subscriptions to  
15 the Phyllis Schlafly Report? Is that your  
16 testimony?

17 A. No. My testimony is people get  
18 subscriptions and pay -- I don't know if we call  
19 them "members" of our organization. I think -- my  
20 answer is this is something that's been -- we've had  
21 to figure out, and John's the one to talk to.

22 Q. Well, when you say, "This is something  
23 we've had to figure out," what do you mean?

24 A. When Phyllis was alive, she made it clear

Edward Martin, Jr.

June 4, 2019

Page 181

1 who was affiliated with which organization.

2 Q. And I'm asking about now. Phyllis isn't  
3 alive now.

4 A. Right, but you might recall that she  
5 passed away, and since the time she passed away, and  
6 since there's been a lawsuit, this is one of the  
7 challenges that's been going on. How do you figure  
8 out -- as we talked earlier, get people that want to  
9 follow in Phyllis' vision to come towards us. Some  
10 come for Phyllis Schlafly Eagles, some come for PSR,  
11 PS Report, so that's an ongoing challenge.

12 Q. How many members does EFELDF currently  
13 have?

14 A. I don't know how to answer that question.  
15 I'll tell you to ask John.

16 Q. And what is it that John -- what is it  
17 about John's position as -- well, strike that.

18 What is John's position for EFELDF?

19 A. He's treasurer.

20 Q. Okay. Anything else?

21 A. Well, John plays a role in our  
22 organization, in all of them, as the best  
23 representative of what Phyllis' vision was. So  
24 that's both institutional memory as well as judgment

Edward Martin, Jr.

June 4, 2019

Page 182

1 on how to move ahead.

2 Q. Is it your testimony that John is the best  
3 representative of what Phyllis' vision was for Eagle  
4 Forum; is that right?

5 A. You asked me about EFELDF.

6 Q. I know.

7 A. Well, we're not affiliated with Eagle  
8 Forum c4 now.

9 Q. Okay.

10 A. So why would -- I don't understand the  
11 question.

12 Q. Well, John was also affiliated with Eagle  
13 Forum, correct?

14 A. John was affiliated with Eagle Forum,  
15 correct.

16 Q. And was John the best representative to  
17 speak to the vision of Eagle Forum just like EFELDF?

18 A. I'm not sure I understand the question.

19 Q. What part don't you understand?

20 A. All of it.

21 Q. Okay. You described John as being the  
22 best representative of what the vision was that  
23 Phyllis had for these organizations, correct?

24 A. I think so. It sounds close, yes.



Edward Martin, Jr.

June 4, 2019

Page 183

1 Q. And that included Eagle Forum, correct?

2 A. I described EFELDF. You said his role at  
3 EFELDF. Yep.

4 Q. Did that also include Eagle Forum?

5 A. Well, Phyllis was alive until five weeks  
6 before EFELDF -- you know, Eagle Forum had the court  
7 order. Or six weeks. So it's kind of a moot point  
8 for us. I don't know how to -- that isn't a role  
9 he's been asked to play.

10 Q. Was it a role that he'd been asked to play  
11 with EFELDF?

12 A. I just told you. It was a role he was  
13 asked to play.

14 Q. Who asked him to play that role?

15 A. It's a role I described.

16 Q. Who asked him to play the role?

17 A. I'm not sure what you're asking.

18 Q. Who asked him to play the role?

19 A. I described the role he plays in the  
20 organization.

21 Q. And you said that was a role he was asked  
22 to play.

23 A. Well --

24 Q. I'm asking you who asked him to play the

Edward Martin, Jr.

June 4, 2019

Page 184

1 role.

2 A. Phyllis, Phyllis. Phyllis asked him to  
3 play that role.

4 Q. And did Phyllis ask him to play that role  
5 with respect to Eagle Forum, too?

6 A. That was the role he was playing with  
7 Eagle Forum, yes, until the lawsuit, yes, exactly  
8 right.

9 Q. And he continued to perform that role  
10 after the lawsuit, correct?

11 A. No.

12 MR. ELSTER: Objection to form,  
13 foundation.

14 THE DEPONENT: How could he?

15 BY MR. SOLVERUD

16 Q. So when John Schlafly says that the leader  
17 of Eagle Forum should be a woman, he was speaking as  
18 the best representative of Phyllis Schlafly's vision  
19 for the organization, wasn't he?

20 MR. ELSTER: Objection. Form,  
21 foundation.

22 THE DEPONENT: Except that Phyllis  
23 was alive, and so the one person that could make  
24 clear Phyllis' vision in a room with John and

Edward Martin, Jr.

June 4, 2019

Page 185

1 Phyllis was Phyllis, just like she made clear to  
2 Mrs. Cori and others. So --

3 BY MR. SOLVERUD

4 Q. That's assuming Phyllis was capable of  
5 understanding what she was saying, correct?

6 MR. ELSTER: Objection.

7 THE DEPONENT: It doesn't sound like  
8 a question. Is that a question?

9 BY MR. SOLVERUD

10 Q. Yes.

11 MR. ELSTER: Objection. Form.

12 THE DEPONENT: I have no answer to  
13 that. I knew she was -- everything I saw about her  
14 in her role was very effective, and . . .

15 BY MR. SOLVERUD

16 Q. Does EFELDF currently have a list of its  
17 members?

18 **A. We have a list of people who are**  
19 **affiliated with our work that are maintained in**  
20 **Eagle Trust. I don't know that we call them**  
21 **"members."**

22 Q. Have there been any changes to your salary  
23 since you were being paid \$150,000?

24 MR. ELSTER: Objection. Relevance.

Edward Martin, Jr.

June 4, 2019

Page 186

1 There's no claim for lost wages. I don't see how  
2 this relates to the pleadings. I think this is  
3 intended to annoy, embarrass, and harass.

4 MR. SOLVERUD: I would be very proud  
5 of my salary if I was Ed. I'm not trying to  
6 embarrass him. Very proud of his salary.

7 MR. ELSTER: Well, we don't want to  
8 talk about his personal salary. I don't see how  
9 it's relevant to the pleadings.

10 MR. SOLVERUD: It goes to bias. It  
11 goes to an attempt to preserve a position. It's  
12 totally relevant. It's part of the background.

13 MR. ELSTER: I don't think it's  
14 relevant to this proceeding.

15 MR. SOLVERUD: Well, that's fine.

16 BY MR. SOLVERUD

17 Q. Have there been any changes to your  
18 salary?

19 MR. ELSTER: Same objections. I'm  
20 instructing him not to answer, and I think this is  
21 personal, confidential information, and intended to  
22 annoy, embarrass, and harass.

23 (Plaintiff's Exhibit 85 was marked for  
24 identification.)

Edward Martin, Jr.

June 4, 2019

Page 187

1 BY MR. SOLVERUD

2 Q. Let me show you a document marked as  
3 Exhibit 85. Exhibit 85 is an email exchange between  
4 you and Ned Pfeifer, correct?

5 **A. I need to read it first.**

6 Q. Sure.

7 **A. Yep. Okay.**

8 Q. And in late 2016, early 2017, you were  
9 trying to renegotiate your salary from the various  
10 Phyllis Schlafly related entities; is that right?

11 **A. I don't know what that means, but so I'd**  
12 **say, "no."**

13 Q. No?

14 In January -- on January 29, 2017, you're  
15 emailing Bruce Schlafly, and you're asking him about  
16 your salary, correct?

17 **A. I don't know that I'm asking him about my**  
18 **salary, but . . .**

19 Q. Tell us what you tell him -- Mr. Schlafly.

20 **A. That doesn't sound like a question.**

21 Q. What is it that you were telling  
22 Mr. Schlafly?

23 **A. We were discussing where we were in terms**  
24 **of my work.**

Edward Martin, Jr.

June 4, 2019

Page 188

1 Q. And you were -- you asked Mr. Schlafly to  
2 help you increase your salary, correct?

3 **A. I don't see that question in there.**

4 Q. Okay. Do you think Exhibit 85 has  
5 anything to do with your compensation?

6 **A. My compensation today?**

7 Q. No. Your compensation as of January of  
8 2017.

9 **A. This is a back and forth with a board**  
10 **member, two board members. So discussing aspects of**  
11 **my work.**

12 Q. And you wanted to be paid \$300,000,  
13 correct?

14 **A. I don't see that, but we can --**

15 Q. Look at the second page, three lines down.  
16 You write, "I agree that \$800,000 is obscene, but I  
17 think the better salary would be about 300,000"; is  
18 that right?

19 **A. Yes, I see that line.**

20 Q. That's what you wrote?

21 **A. That is what I wrote.**

22 Q. And you believe that Eagle Forum Education  
23 and Legal Defense Fund and America's Future should  
24 split that compensation for you because they had

Edward Martin, Jr.

June 4, 2019

Page 189

1 enough money in the bank to pay it, correct?

2 **A. I was having a discussion with a board**  
3 **member about my work and what it was worth. That's**  
4 **what that is.**

5 Q. That's what you felt it was worth?

6 **A. I felt it was worth a lot more than that,**  
7 **but I thought that was appropriate.**

8 Q. How much do you think --

9 **A. I don't know. I don't remember.**

10 Q. And as of January 29, 2017, you're also  
11 performing work for Phyllis Schlafly's American  
12 Eagles, correct?

13 **A. I think so.**

14 Q. And it's your testimony that you weren't  
15 receiving any salary or compensation from Phyllis  
16 Schlafly's American Eagles for the work you were  
17 performing, correct?

18 **A. I think that's right, timing wise. I'd**  
19 **have to look if there's something that refreshes**  
20 **that recollection, but I think the timing sounds**  
21 **right.**

22 Q. And how much time were you spending on  
23 America's Future back in --

24 MR. ELSTER: Objection to the

Edward Martin, Jr.

June 4, 2019

Page 190

1 relevance.

2 BY MR. SOLVERUD

3 Q. -- January of 2017?

4 MR. ELSTER: Objection to the  
5 relevance. I don't understand these questions.  
6 America's Future is not a party to this case. I  
7 don't understand.

8 BY MR. SOLVERUD

9 Q. You can answer.

10 MR. ELSTER: Objection. I'm trying  
11 to understand what the relevance is.

12 MR. SOLVERUD: Don't worry about it.  
13 I'm not asking you to ask questions.

14 MR. ELSTER: I'm going to instruct  
15 him not to answer.

16 MR. SOLVERUD: You're instructing him  
17 not to answer on grounds of relevance?

18 MR. ELSTER: On the grounds of  
19 relevance, and I don't see that it's proportional to  
20 the needs of the case. And I think if you're  
21 inquiring into the potential compensation from other  
22 entities, where this line is going, I think that  
23 it's meant to annoy, embarrass, and harass,  
24 particularly as it relates to another entity.



Edward Martin, Jr.

June 4, 2019

Page 191

1 MR. SOLVERUD: Are you instructing  
2 him not to answer?

3 MR. ELSTER: Correct. And I'm asking  
4 to -- we're in good faith here. Unless you can  
5 demonstrate.

6 MR. SOLVERUD: I will tell you that  
7 if he's not getting paid for -- by PSAE, but he's  
8 performing work, he's getting a salary from other  
9 entities to pay for the work he was performing for  
10 Phyllis Schlafly's American Eagles, because I think  
11 what the evidence will show is that he was not doing  
12 \$150,000 worth of work for American's Future.

13 So, instead, his compensation -- and  
14 you'll see the history of his compensation is they  
15 didn't distinguish between the work he was doing for  
16 one entity versus another entity. They went to  
17 other groups, and they cobbled money together to pay  
18 for the work he was doing, whether it was for PSAE,  
19 Eagle Forum, or whatever entity it was, which makes  
20 it relevant to his compensation.

21 MR. ELSTER: How is compensation  
22 relevant to the unfair competition and trademark  
23 claims?

24 MR. SOLVERUD: I'm entitled to ask

Edward Martin, Jr.

June 4, 2019

Page 192

1 about his background.

2 MR. ELSTER: Okay.

3 MR. SOLVERUD: He's the president of  
4 Phyllis Schlafly's American Eagles. He was the  
5 president of Eagle Forum at the same time,  
6 overlapping duties, according to him. So I'm  
7 entitled to ask these questions. It's calculated to  
8 lead to the discovery of admissible evidence.

9 MR. ELSTER: What's the question?  
10 Before we had an exchange. If it's about his salary  
11 or compensation from other entities --

12 MR. SOLVERUD: I'm not going to waste  
13 any more of my valuable deposition time talking to  
14 you about this. If you want to instruct him not to  
15 answer, I think you're wrong. I think it's  
16 inappropriate to instruct the witness not to answer  
17 based on relevance grounds. If that's what you want  
18 to do, that's you, and we can take it up.

19 MR. ELSTER: Okay.

20 MR. SOLVERUD: So.

21 MR. ELSTER: And based on that, I'm  
22 instructing him not to answer, not just on relevance  
23 grounds. I think it's attempted to annoy,  
24 embarrass, and harass. That's why.

Edward Martin, Jr.

June 4, 2019

Page 193

1 BY MR. SOLVERUD

2 Q. How much work were you performing for  
3 America's Future in January of 2017?

4 **A. I don't remember it specifically.**

5 Q. Did you ever keep track of any of the  
6 amount of time you were spending on Phyllis  
7 Schlafly's American Eagles versus America's Future  
8 versus EFELDF?

9 **A. Only in broad strokes about knowing the**  
10 **work we were doing, different things that were**  
11 **happening.**

12 Q. When you say, "With broad strokes," what  
13 do you mean?

14 **A. Well, there was things every month that**  
15 **was America's Future related -- radio commentaries,**  
16 **or General Singlaub's -- the plans around General**  
17 **Singlaub's desires and all those kinds of things.**  
18 **So that -- issues that he cared about were**  
19 **overlapping with our c3 work, our Eagle Forum**  
20 **Education and Legal Defense Fund. So it was as a**  
21 **professional.**

22 **It was understood -- and, again,**  
23 **Phyllis -- when I was hired to do the job for**  
24 **Phyllis, it was a similar relationship with our work**

Edward Martin, Jr.

June 4, 2019

Page 194

1 between -- splitting between the two. It was a  
2 sense that the balance was -- that was you had to  
3 kind of -- some days, some weeks I'd work on one  
4 thing all the time and other weeks other things.

5 Q. Do you remember what my question was?

6 A. Yeah.

7 Q. What was it?

8 THE DEPONENT: Read it back. He  
9 doesn't remember his question. Just read it back to  
10 him.

11 BY MR. SOLVERUD

12 Q. My question is, did you --

13 MR. ELSTER: Wait a second.

14 BY MR. SOLVERUD

15 Q. Did you keep track?

16 A. I just said to you, yes.

17 Q. How did you keep track?

18 A. In the professional setting, knowing the  
19 things I was doing.

20 Q. Did you keep time sheets?

21 A. No, of course not. You know that.

22 Q. How would I know that?

23 A. We didn't have time sheets.

24 Q. Okay. So you didn't record any of the

Edward Martin, Jr.

June 4, 2019

Page 195

1 time that you were spending on behalf of Phyllis  
2 Schlafly's American Eagles versus any of the other  
3 entities? Is that true?

4 **A. No, we did not record time sheets.**

5 **(Plaintiff's Exhibit 86 was marked for**  
6 **identification.)**

7 **BY MR. SOLVERUD**

8 Q. Okay. Let me show you a document  
9 Exhibit 86. Tell me when you've had a chance to  
10 look at it.

11 **A. Yep. I've looked at it.**

12 Q. As of February 25, 2017, you're telling  
13 Ned Pfeifer that you need to make \$250,000 per year  
14 right away and also have health insurance coverage,  
15 correct?

16 **A. That's what the email says.**

17 Q. And Ned Pfeifer didn't have any  
18 relationship to America's Future, correct?

19 **A. What -- I'm not sure what relationship.**  
20 **He knows -- he was very close to Phyllis, so.**

21 Q. Was Ned Pfeifer on the board of America's  
22 Future?

23 **A. No, no, but he was very close to Phyllis**  
24 **and was aware of the work we're doing.**

Edward Martin, Jr.

June 4, 2019

Page 196

1 Q. Okay. And in your email to Ned Pfeifer,  
2 you say that "Trump administration folks have  
3 offered me some spots that are not perfect, but  
4 would be good to transition back into law practice."  
5 What spots were you offered?

6 A. I was considered for an ambassadorship and  
7 a few other things. Didn't get very far.

8 Q. What ambassadorship?

9 A. The ambassador to the UN in Geneva.

10 Q. And was that -- did they actually offer  
11 you that spot?

12 A. It's a little bit more complicated. It  
13 was something that the senators were open to, and  
14 people were talking about, but in a transition. It  
15 was a transition time, so it never got to the point  
16 of an offer.

17 Q. What other spots were you offered?

18 A. There was a discussion of the office of  
19 public liaison in the White House, but, again, the  
20 kinds of things that are being talked about are  
21 transition, so.

22 Q. And, again, I'm not asking about what you  
23 had discussions with. I'm asking you what spots  
24 have been offered to you?

Edward Martin, Jr.

June 4, 2019

Page 197

1           **A.     Those would be -- that's a description. I**  
2       **would say that's a description of these, some of**  
3       **these things that were not perfect, possible spots,**  
4       **but there was not an offer from the White House or**  
5       **from the president.**

6           Q.     You say, "No one can do the job needed  
7       right now except me, and I am sure I am worth the  
8       money." Do you see that?

9           **A.     Yes, sir.**

10          Q.     What job are you referring to?

11          **A.     Leading Phyllis' organizations.**

12          Q.     Did you talk to John about your demands  
13       for salary in the range of 250, 300 to lead Phyllis'  
14       organizations?

15          **A.     I don't recall that.**

16          Q.     Did John ever express to you disagreement  
17       with your salary demands to lead the Phyllis  
18       Schlafly organizations?

19          **A.     I don't recall that.**

20          Q.     Did anybody ever express disagreement to  
21       your demands for salaries to lead the Phyllis  
22       Schlafly organizations?

23          **A.     Well, at the board meeting of EFELDF in, I**  
24       **think, September, each September there would be a**

Edward Martin, Jr.

June 4, 2019

Page 198

1 conversation about my work and our role, and then I  
2 think this is happening after the January gathering  
3 meeting. So those conversations were ongoing, and  
4 people had lots of opinions on the job I was doing.  
5 And we -- I think, around then, we were down in  
6 Tennessee to see General Singlaub about America's  
7 Future. There was a number of transition items.

8 Q. Did PSAE ever contribute any monies to  
9 salary or benefits for you?

10 A. I don't recall that.

11 Q. Did they ever pay for any life insurance  
12 policies or health insurance benefits for you?

13 A. I don't recall that.

14 Q. Did you ever ask them to?

15 A. PSAE?

16 Q. Yes.

17 A. I don't recall if that was something we  
18 talked about.

19 Q. What is your current income from the  
20 various Phyllis Schlafly organizations?

21 MR. ELSTER: Objection. Relevance.  
22 It's confidential. It's to annoy, embarrass,  
23 harass, and instruct him not to answer.

24 / / /



Edward Martin, Jr.

June 4, 2019

Page 199

1 BY MR. SOLVERUD

2 Q. What are the various sources of income  
3 that you receive?

4 MR. ELSTER: Same objection.  
5 Regarding to PSAE.

6 MR. SOLVERUD: So you're instructing  
7 him not to answer as to where he gets money, where  
8 he makes revenue from?

9 MR. ELSTER: He can answer as to PSAE  
10 is what I'm saying.

11 MR. SOLVERUD: Okay.

12 MR. ELSTER: His personal  
13 compensation.

14 MR. SOLVERUD: I'm asking for any  
15 sources of revenue, because there's issues of books,  
16 there's issues that get into intellectual property  
17 rights, all of which is relevant.

18 MR. ELSTER: If you can be more  
19 specific.

20 MR. SOLVERUD: To be more specific, I  
21 need to ask him about the sources of revenue.

22 BY MR. SOLVERUD

23 Q. So what are the various sources of revenue  
24 that you -- sources of income that you receive?

Edward Martin, Jr.

June 4, 2019

Page 200

1           **A.     For Phyllis Schlafly organizations?**

2           Q.     Just what --

3           **A.     America's Future, and Eagle Forum**  
4 **Education and Legal Defense Fund.**

5           Q.     Anything else?

6           **A.     The proceeds of that book. There's**  
7 **royalties, but I think they're only -- there's not**  
8 **anymore. I think that's all as far as I can recall.**

9           Q.     What royalties do you earn?

10          **A.     The Conservative Case for Trump, the**  
11 **royalties are split between myself and Mr. Decker**  
12 **and Phyllis' portion.**

13          Q.     How are they split?

14          **A.     A third and a third and a third.**

15          Q.     How much money have you made?

16          **A.     I can't recall exactly. It's about \$5,000**  
17 **total approximately. I'm not sure.**

18          Q.     Do you have any other royalty agreements?

19          **A.     Nope.**

20          Q.     Are there any other sources of income that  
21 you receive, other than royalties, salary for  
22 America's Future and your salary from EFELDF?

23          **A.     No.**

24          Q.     Eagle Forum was founded by Phyllis

Edward Martin, Jr.

June 4, 2019

Page 201

1 Schlafly in 1975, right?

2 **A. I don't know about that date, but founded**  
3 **by Phyllis Schlafly for sure.**

4 Q. And Eagle Forum was founded to prove and  
5 advance the notion that citizen volunteers through  
6 rigorous advocacy of conservative and pro-family  
7 values can affect government policies in congress,  
8 and state legislature, and city, counties, and  
9 school boards?

10 **A. Are you reading from something? Because I**  
11 **don't have it memorized. If you're reading -- I'd**  
12 **have to see it written. I'm not sure I can follow**  
13 **that.**

14 Q. Let me take it slow.

15 Isn't it true that Eagle Forum was founded  
16 to prove and advance the notion that citizen  
17 volunteers through rigorous advocacy of conservative  
18 and pro-family values can affect government  
19 policies?

20 MR. ELSTER: Objection. Form.

21 THE DEPONENT: It's -- that's a  
22 description of a lot of what we do. I don't know if  
23 that's what -- solely what it was founded for, if  
24 that's your question. I'd have to look further at

Edward Martin, Jr.

June 4, 2019

Page 202

1 the founding and notes around it.

2 BY MR. SOLVERUD

3 Q. Okay. Eagle Forum was not focused on just  
4 federal government, but it was focused on affecting  
5 policies at the congressional level, the state  
6 legislature, city councils, and even school boards;  
7 isn't that right?

8 MR. ELSTER: Objection. Compound.

9 THE DEPONENT: Are you asking at the  
10 founding or in its general work?

11 BY MR. SOLVERUD

12 Q. As part of its general work.

13 A. **All throughout its time?**

14 Q. Yeah.

15 A. **That's correct.**

16 Q. And Phyllis Schlafly used Eagle Forum to  
17 accomplish her plans and her programs, correct?

18 A. **Phyllis Schlafly used Eagle Forum, EFELDF,**  
19 **PACs, RNC Life, other organizations to accomplish**  
20 **her ends.**

21 Q. Okay. And one of -- and Eagle Forum was  
22 one of those entities as she used to accomplish  
23 her --

24 A. **Correct.**

Edward Martin, Jr.

June 4, 2019

Page 203

1 Q. And you understood Eagle Forum was a  
2 501(c)(4), right?

3 A. Correct.

4 Q. You understood that Eagle Forum is  
5 governed by its bylaws, right?

6 A. Correct.

7 (Plaintiff's 1, previously marked, was  
8 identified for the record.)

9 BY MR. SOLVERUD

10 Q. And you can identify Exhibit 1 --

11 MR. ELSTER: I've got the first one,  
12 so -- but thanks.

13 BY MR. SOLVERUD

14 Q. -- as Eagle Forum bylaws, correct?

15 MR. ELSTER: Take your time and read  
16 through them.

17 THE DEPONENT: There's notes on this.  
18 There's some notes on this that I don't recognize.  
19 I'm not sure what they are.

20 BY MR. SOLVERUD

21 Q. The typewritten materials in Exhibit 1 you  
22 recognize as the bylaws, correct?

23 A. A draft, a copy of the bylaws at some  
24 point. I'm not sure which ones, and I'm not sure,

Edward Martin, Jr.

June 4, 2019

Page 204

1 **again, why they were changed.**

2 Q. You understood that the bylaws charged the  
3 board of directors to protect the Eagle Forum name,  
4 correct?

5 MR. ELSTER: Objection to the extent  
6 it calls for a legal conclusion.

7 THE DEPONENT: I don't know what  
8 to -- there's -- if you want me to read the whole  
9 thing again to see that language. Can you say the  
10 language again?

11 BY MR. SOLVERUD

12 Q. I'll help you with the language.

13 **A. Okay.**

14 Q. If you look at the Article One, Section 1,  
15 and can you read the second sentence of Article One,  
16 Section 1.

17 **A. "In so doing through public discussion**  
18 **groups, forums, panels, lectures, study groups" --**

19 Q. Are you at Article One, Section 1?

20 **A. Sorry. I was Section 1. Reading.**

21 **Article One, section what?**

22 Q. Section 1, the second sentence.

23 **A. Oh.**

24 Q. Can you read that?

Edward Martin, Jr.

June 4, 2019

Page 205

1           **A.     Yes.     Article One, Section 1.**

2                   **"The name of this organization shall be**  
3 **Eagle Forum.   The Board of Directors shall protect**  
4 **the name 'Eagle Forum' and may authorize its use by**  
5 **state Eagle Forums and local Eagle Forum chapters in**  
6 **accordance with Articles eight and ten,**  
7 **respectively."**

8           Q.     You understood that the bylaws charged the  
9 board of directors of Eagle Forum to protect the  
10 Eagle Forum name, correct?

11           **A.     I understand that, what it says on here,**  
12 **yes.**

13           Q.     Okay.   During your involvement with Eagle  
14 Forum, Eagle Forum always maintained an office in  
15 the District of Columbia, correct?

16           **A.     During my time, Eagle Forum always**  
17 **maintained an office.   Phyllis -- yeah, we had an**  
18 **office in the District of Columbia.**

19           Q.     And during your involvement with Eagle  
20 Forum, Eagle Forum's principal office was also  
21 located at 322 State Street, Suite 301, Alton,  
22 Illinois 62002, correct?

23           **A.     Eagle Trust?**

24           Q.     No.   Eagle Forum --

Edward Martin, Jr.

June 4, 2019

Page 206

1           **A.     No.**

2           Q.     -- principal office.

3           **A.     I don't think so, no.**

4           Q.     Did Eagle Forum ever have a principal  
5 office at 322 State Street?

6           **A.     I'm not sure what that term means,**  
7 **"principal office" with regard to Eagle Forum. I**  
8 **think it was wherever Phyllis was, was where our**  
9 **office was, Eagle Forum.**

10                   **(Plaintiff's Exhibit 87 was marked for**  
11 **identification.)**

12           **BY MR. SOLVERUD**

13           Q.     Let me show you a document marked  
14 Exhibit 87. Specifically, if you look at  
15 page -- tell me when you're at Page 48.

16           **A.     Mm-hmm. Okay.**

17           Q.     Go to Page 48.

18           **A.     Okay.**

19           Q.     Are you there?

20           **A.     Yep.**

21           Q.     Okay. So Exhibit 87 is the Eagle Forum  
22 organizational handbook that was prepared by John  
23 Schlafly and Phyllis Schlafly about Eagle Forum. On  
24 Page 48, there's a statement that says, "Eagle Forum



Edward Martin, Jr.

June 4, 2019

Page 207

1 maintains two offices. The headquarters office is  
2 Box 618, Alton, Illinois 62202. All memberships and  
3 mailings are handled from this office. The  
4 legislative office is Suite 203, 316 Pennsylvania  
5 Avenue Southeast, Washington, DC 20003." Do you see  
6 that?

7 **A. Yes, sir.**

8 Q. Is that a true statement?

9 **A. You read what was there. Is that what you**  
10 **mean?**

11 Q. Yeah. Was that your understanding?

12 **A. Yes. This is an old document. 1991,**  
13 **right? So this is -- some things, as I read through**  
14 **it, are different. So I'd have to -- I think it**  
15 **sounds right, but I think there's some things that**  
16 **changed over time in the 30, 25, 28 years, so.**

17 Q. Sure.

18 **A. It sounds right.**

19 Q. And further down at the bottom of Page 48,  
20 it says, "Eagle Council is the annual conference  
21 held every fall since 1972 either in Washington,  
22 D.C. or in St. Louis, Missouri. Those invited are  
23 Eagle leaders from all over the country, including  
24 national and state officers and chapter presidents."

Edward Martin, Jr.

June 4, 2019

Page 208

1 Do you see that?

2 **A. Yes, sir.**

3 Q. Is that true?

4 **A. Yes. Although, again, 28 years later,**  
5 **it's -- it's been handled differently in terms of**  
6 **who is invited.**

7 Q. Okay. There is a -- above there's a  
8 reference to Eagle Trust Fund. It says, "Eagle  
9 Trust Fund is the publisher of the Phyllis Schlafly  
10 Report. Why is this different from Eagle Forum?  
11 Simply because that is the way it evolved." Is that  
12 true?

13 MR. ELSTER: Objection. Speculation.

14 THE DEPONENT: What you read is  
15 there. I don't have a sense of whether that's true  
16 and how it evolved.

17 BY MR. SOLVERUD

18 Q. You don't know one way or the other?

19 **A. No, I don't know one way or the other.**

20 Q. Okay. If you -- you understand that  
21 members of the Eagle Forum -- well, strike that.

22 You understood that Eagle Forum had  
23 members?

24 **A. C4?**

Edward Martin, Jr.

June 4, 2019

Page 209

1 Q. Yes, sir.

2 A. I understood that Phyllis' organizations  
3 had Eagles, and I think the term was more difficult  
4 than saying who had members only.

5 Q. But did you understand, sir, that Eagle  
6 Forum was a membership organization?

7 A. C4?

8 Q. Yes, sir.

9 A. C4 had members.

10 Q. Okay.

11 A. Again, it was defined by Phyllis, but it  
12 was members, yes.

13 Q. And it was actually defined by the bylaws,  
14 correct?

15 A. No.

16 Q. No? The membership in Eagle Forum was  
17 established by and provided for in the bylaws; isn't  
18 that right?

19 MR. ELSTER: Do you want to look  
20 here?

21 THE DEPONENT: If you can refer to  
22 it. I just -- I'm not sure where to refer it as.  
23 BY MR. SOLVERUD

24 Q. Article Four.

Edward Martin, Jr.

June 4, 2019

Page 210

1           **A.     Yeah.**

2           Q.     Yes?

3           **A.     What was the question?**

4           Q.     So do you understand that membership in  
5     Eagle Forum was established by and provided for  
6     through the bylaws, specifically Article Four?

7           **A.     I agree that Article Four is where**  
8     **membership is described, but I would tell you that**  
9     **the way Article Four was implemented was that**  
10    **Phyllis Schlafly was in charge of describing who**  
11    **fulfilled the -- was in substantial agreement with**  
12    **the purposes and principles of the organization.**

13          Q.     And Article Four doesn't contain any  
14     reference to Phyllis Schlafly, does it?

15          **A.     No, sir.**

16          Q.     Article Four provides that in order to be  
17     a member of Eagle Forum, you have to pay dues,  
18     correct?

19          **A.     No, sir.**

20          Q.     It doesn't say that?

21          **A.     No. It says first you have to demonstrate**  
22    **substantial agreement with the purpose and**  
23    **principles.**

24          Q.     I was going to get to that, too.

Edward Martin, Jr.

June 4, 2019

Page 211

1           **A.     Well, that's what it says in time.**

2           Q.     Okay.

3           **A.     So you can't pay your dues until you get**  
4 **through Section 1.**

5           Q.     Okay.

6           **A.     And that's where Phyllis Schlafly came in.**

7           Q.     Okay. So you understood that in order to  
8 be a member, you had to first demonstrate  
9 substantial agreement with the purposes and  
10 principles stated in Articles Two and Three above,  
11 correct?

12          **A.     That's what this says, yes.**

13          Q.     And you also understood that then you had  
14 to pay dues -- if you read the rest of that  
15 sentence -- unless they're waived for good cause,  
16 correct?

17          **A.     Correct.**

18          Q.     And approved by the board of directors,  
19 correct?

20          **A.     Correct.**

21          Q.     And the principles and purposes of Eagle  
22 Forum included the matter set forth in Article Two,  
23 correct?

24          **A.     Article Two, or Article Three?**

Edward Martin, Jr.

June 4, 2019

Page 212

1 Q. Article Two. Let's start with -- well,  
2 it's both. So in Article Two, it says --

3 **A. Sorry.**

4 Q. It sets forth the purpose, correct?

5 **A. Oh, yes. I see that.**

6 Q. And Article Three, it sets forth the  
7 principles?

8 **A. Right.**

9 Q. Would you agree with me that the purposes  
10 and principles of Eagle Forum included American  
11 sovereignty?

12 **A. Pardon me? The term is a useful term, but**  
13 **it depends on what time period you're using it.**  
14 **American sovereignty used in 2016 was attached to**  
15 **the Trump vision as opposed to in 1995 when it was**  
16 **attached to fight the effort to harmonize the**  
17 **patented system with Europe. So that, again, would**  
18 **be where Phyllis was required.**

19 Q. In 2016 --

20 **A. Yes, sir.**

21 Q. Well, strike that.

22 In 2016, the principles and purposes of  
23 Eagle Forum included American sovereignty; isn't  
24 that true?

Edward Martin, Jr.

June 4, 2019

Page 213

1           **A.     As it related to Donald Trump and his**  
2 **positions.**

3           Q.     Is it your testimony that it only related  
4 to Donald Trump?

5           **A.     I guess -- I'm sorry. You asked for 2016.**  
6 **When you talk about being in substantial agreement**  
7 **with the efforts of the organization as described by**  
8 **Phyllis, that would be the American sovereignty, but**  
9 **in particular, it wasn't -- it was what was**  
10 **happening around the issues of trade and immigration**  
11 **and Trump's articulation of that.**

12          Q.     Isn't it true in 2016, the principles of  
13 Eagle Forum included pro-life, conservative,  
14 empowering people, pro-family, protecting American  
15 sovereignty, educating people on the importance of  
16 strategic balance, educating people on the shifts in  
17 world communism, helping people understand how  
18 politics works, precinct captains, all the kinds of  
19 thing -- all of those kinds of things? Do you agree  
20 with that?

21          **A.     That sounds like a good description, a**  
22 **broad description. There's probably some that are**  
23 **missing there.**

24          Q.     Okay. You understood in 2016, Eagle Forum

Edward Martin, Jr.

June 4, 2019

Page 214

1 was against the expansion of NATO, correct?

2 **A. 2016?**

3 Q. Yes.

4 **A. It wasn't a big issue, but, yes, I think**  
5 **so.**

6 Q. 2016 Eagle Forum was against UN  
7 interference with property rights, correct?

8 **A. Yes, sir.**

9 Q. And you understood that 2016, Eagle Forum  
10 was in favor of preserving America, correct?

11 **A. I'm not sure what that term means. Is**  
12 **that -- that's a funny term. Preserving America? I**  
13 **don't know.**

14 Q. In 2016, Eagle Forum was actively working  
15 on immigration issues, correct?

16 **A. 2000 and what year?**

17 Q. '16.

18 **A. Working, yes. Immigration, sure.**

19 Q. And 2016, Eagle Forum was against  
20 Constitutional Convention, or Con-Con, correct?

21 **A. Yes.**

22 Q. Were you a member of Eagle Forum?

23 **A. I was an employee of Eagle Forum, so I**  
24 **don't know if that made me a member with the**



Edward Martin, Jr.

June 4, 2019

Page 215

1 **purposes of the organization. I don't know.**

2 Q. Okay. Do you know whether you were ever a  
3 member outside of your employment?

4 **A. I don't know that answer. I don't know.**

5 Q. Did you ever pay any dues to Eagle Forum?

6 **A. I felt you might ask me that next. I'm**  
7 **not sure of that. I think I got the PS Report for a**  
8 **while, but I'm not sure whether that was because I**  
9 **paid dues or not. I don't know.**

10 Q. When you were president of Eagle Forum,  
11 you understood that Eagle Forum depended on  
12 membership dues from its members for financial  
13 support, correct?

14 **A. No, sir.**

15 Q. You didn't believe that -- when you were  
16 president, you didn't believe Eagle Forum was  
17 dependent on dues?

18 **A. Not solely dependent. It was a factor,**  
19 **but it relied almost exclusively on the good will of**  
20 **Phyllis Schlafly to raise the money.**

21 Q. Okay. And how did that money -- where did  
22 that money come from?

23 **A. Well, Phyllis -- Phyllis had used mail and**  
24 **other of her efforts to raise money.**

Edward Martin, Jr.

June 4, 2019

Page 216

1 Q. Okay. And in 2016, what were the sources  
2 of revenue for Eagle Forum?

3 A. I'd have to look back to know the details.  
4 I believe there would have been some fundraising  
5 through mail. I suppose some membership dues. I'm  
6 not sure. I'd have to look. That would be a  
7 question for John.

8 Q. You understood that direct mail was an  
9 important aspect of Eagle Forum's fundraising,  
10 correct?

11 A. I'd say it differently.

12 Q. How would you say it?

13 A. Phyllis was a very effective fundraiser on  
14 her own letters and her own PSR. Direct mail  
15 fundraising, which I would use -- it's a broader  
16 term -- was a tougher -- it's a tougher thing to do.  
17 Or the power of Phyllis' name on a letter was what  
18 she wanted, was what mattered most.

19 Q. Well, I mean, are you distinguishing  
20 between Phyllis' name on a letter and direct mail?

21 A. Yes.

22 Q. How do you distinguish between the two  
23 things?

24 A. I'm saying Phyllis had -- over her long

Edward Martin, Jr.

June 4, 2019

Page 217

1 career, she developed probably the most valuable, in  
2 terms of dollars, newsletter that was ever created.  
3 And the newsletter was a vehicle -- her loyal  
4 readers of the newsletter became the people who she  
5 could speak to, to raise money.

6 And so when we would do direct mail, which  
7 is a different kind of thing, direct mail is  
8 prospecting and repeated -- that was a  
9 different -- that was not how Phyllis -- that was  
10 not how she or our organizations, what we really  
11 primarily relied on for fundraising.

12 Q. What would you -- what would you call the  
13 monies that were raised by Eagle Forum that came in  
14 through Phyllis Schlafly's letters to members? What  
15 would you call that?

16 A. Phyllis' money.

17 Q. But what would you call that process?

18 A. I just said. It was a combination -- I  
19 meant that it wasn't -- direct mail is those long  
20 letters that are 15 pages. That's a term of art.  
21 That's just the way I used it. You know, 15 pages.

22 Q. I'm just trying to get on the same line as  
23 to what words you've used for what the mail she was  
24 sending.

Edward Martin, Jr.

June 4, 2019

Page 218

1           **A. Her own letters as opposed to direct mail**  
2       **fundraising appeals. Maybe there's not a**  
3       **distinction worth noting, but it feels that there**  
4       **is.**

5           Q. Is it fair to say that you understood that  
6       while you were acting as president of Eagle Forum,  
7       you understood that Eagle Forum relied on monies  
8       collected from supporters through mail?

9           **A. I think so. It's a little bit -- it's a**  
10       **little bit vague, how you described it, but I think**  
11       **Eagle Forum c4 and Eagle Forum c3 and RNC Life and**  
12       **others relied on Phyllis' mailing letters and**  
13       **raising money and also on the reservoir of money**  
14       **that she had raised for decades.**

15          Q. And I'm distinguishing that from -- Eagle  
16       Forum wasn't engaging in phone solicitations for  
17       donations, correct?

18       **A. No.**

19       Q. Okay.

20       **A. But we did direct mail solicitation.**

21       Q. Right. And so I'm trying to distinguish  
22       mail from phone solicitations.

23       **A. Oh, okay.**

24       Q. And isn't it true also that Eagle Forum

Edward Martin, Jr.

June 4, 2019

Page 219

1 wasn't heavily relying on donations that came in  
2 through social media?

3 MR. ELSTER: Objection. Vague as to  
4 "heavily rely" on.

5 THE DEPONENT: Correct. I mean, I  
6 can answer. Correct.

7 BY MR. SOLVERUD

8 Q. Okay. I mean, the primary mechanism was a  
9 letter with the BRE envelope coming back?

10 A. The primary --

11 Q. Through the mail.

12 A. I guess I would say it this way. I don't  
13 know year to year the percentages, but that was the  
14 most effective tool we had was that -- I just don't  
15 know the percentages. A few years -- and Phyllis  
16 would have had some major or some donors of some  
17 size, but not too many.

18 Q. And you understood that in order to  
19 conduct a mail program, you've got to have a list of  
20 addresses to send it to, correct?

21 A. Correct.

22 (Plaintiff's Exhibit 88 was marked for  
23 identification.)

24 / / /

Edward Martin, Jr.

June 4, 2019

Page 220

1 **BY MR. SOLVERUD**

2 Q. Let me show you a document marked  
3 Exhibit 88. Exhibit 88 is a strategic plan that you  
4 prepared for Eagle Forum, correct?

5 A. I would describe it -- it looks like it's  
6 an email sent to myself. It's a draft. This is  
7 before the board meeting. So this is a draft of  
8 some ideas, I think, but I'd have to -- let me look  
9 a little closer. Yeah, it looks like a draft of  
10 some kind.

11 Q. Okay. And it's a draft of a strategic  
12 plan that you prepared, correct?

13 A. It's my file. I don't know if I  
14 had -- where I had input. I don't recall that.

15 Q. Do you know whether anybody else had a  
16 hand in preparing Exhibit 88?

17 A. I can't recall that.

18 Q. Okay. And it's a strategic plan for the  
19 period from 2015 through 2017, correct?

20 A. It's a draft, yes.

21 Q. For the period from 2015 through 2017?

22 A. Yes. It looks -- that's what it's stated,  
23 the date on the top, but, yes.

24 Q. It's a Google doc that you prepared,

Edward Martin, Jr.

June 4, 2019

Page 221

1 right?

2           **A.**     It's -- well, it's certainly a Google doc.  
3     **The heading is a little bit funny for what I'm used**  
4     **to, but it's familiar enough, now that I've looked**  
5     **at it, as something I must have worked on then.**

6           **Q.**     And one of the headings at the bottom is  
7     **"Development for long-term sustainability."**

8           **A.**     **Yes, sir.**

9           **Q.**     And the first thing identified under  
10    **"Development for long-term sustainability" is direct**  
11    **mail, correct?**

12          **A.**     **Correct.**

13          **Q.**     That's something that you put together in  
14    **this document. That was one of your ideas, correct?**

15          **A.**     **I don't recall that. I told you this is a**  
16    **draft. I don't know whether this was asked to be**  
17    **prepared in anticipation. I don't know if I got**  
18    **input, but it certainly says, "direct mail."**

19          **Q.**     Well, independent of this, you understood  
20    **during the term that you were acting as president**  
21    **that the direct mail was an integral aspect of Eagle**  
22    **Forum's long-term sustainability, fair?**

23          **A.**     **It was a part of it, sure.**

24          **Q.**     And in -- under Roman Numeral II, it talks

Edward Martin, Jr.

June 4, 2019

Page 222

1 about the 2016 Presidential Election Project,  
2 correct?

3 **A. Yes.**

4 Q. And you say that you want to lead on  
5 issues in the 2016 cycle, right?

6 **A. Yes, sir, mm-hmm.**

7 Q. And the issues that you identified  
8 for -- that you wanted to lead on in the 2016 cycle  
9 are listed there in 1 through 6, correct?

10 **A. Yes, sir.**

11 Q. And number 3 is American sovereignty,  
12 especially fight against amnesty/immigration, right?

13 **A. Yes, sir.**

14 Q. That's something that you thought was an  
15 important issue in the 2016 election?

16 **A. Well, when this document is created, it's**  
17 **2015. We expected it would be, yes.**

18 Q. Okay. And national defense you believed  
19 was an important issue?

20 **A. Yes.**

21 Q. And stopping judicial supremacists and  
22 Con-Con, you believe was an important issue?

23 **A. Correct.**

24 Q. And these were important issues for Eagle



Edward Martin, Jr.

June 4, 2019

Page 223

1 Forum, correct?

2 MR. ELSTER: Objection. Broad as to  
3 time, overly broad as to time.

4 THE DEPONENT: Well, yes, except that  
5 there's other things sprinkled in there, as you see.  
6 RNC for Life is not Eagle Forum formerly. RNC for  
7 Marriage was something that we -- Phyllis was toying  
8 with starting. We were -- RNC Common Core never  
9 happened. So these are all related issues to  
10 Phyllis' work, and that's why it looks like a draft,  
11 but, yes, these are all key issues for that time  
12 period. It's just I'm not sure that they would all  
13 be described as c4. Some of them would be other  
14 work.

15 BY MR. SOLVERUD

16 Q. And above you talked about this is "A  
17 two-year plan to advance the values of God, family  
18 and country, and to expand Eagle Forum by continuing  
19 to advocate for the sanctity of life, traditional  
20 marriage, strong national defense, border control,  
21 and a free enterprise system which Phyllis Schlafly  
22 and the Eagle Forum have done for the past 42  
23 years." Did I read that correctly?

24 A. Yes, sir.

Edward Martin, Jr.

June 4, 2019

Page 224

1 Q. You understood that while you were an  
2 officer of Eagle Forum, that Eagle Forum had  
3 received hundreds of thousands of dollars in  
4 donations annually from donors across the United  
5 States, correct?

6 A. I don't -- I don't know about the numbers,  
7 and I don't know about the amounts. You know, I  
8 don't know about those amounts. And I think that I  
9 know that Phyllis Schlafly received a lot of  
10 donations in different categories of the work she  
11 did, so I don't know whether it would be Eagle  
12 Forum, c3, c4, RNC Life, or PACs.

13 Q. Well, while you claim to be president of  
14 Eagle Forum --

15 A. Yes, sir.

16 Q. -- you had to -- it was part of your job  
17 to understand how much revenue was coming in the  
18 door in donations at Eagle Forum, right?

19 A. No, not really. It was Phyllis', as  
20 chairman. The job I had was very strictly sort of  
21 managed by Phyllis, and so she was handling that,  
22 and John was handling that. It was not a big focus.

23 Q. So you understood that Eagle Forum  
24 received donations annually from donors across the

Edward Martin, Jr.

June 4, 2019

Page 225

1 United States, but you didn't know how much; is that  
2 fair?

3 A. Yeah, I didn't know how much. Also where  
4 they came in. You know, we would do different  
5 letters.

6 Phyllis had developed a system of doing  
7 different "asks" that got -- raised money to  
8 different areas that she saw usually ahead of other  
9 people, and so that allocation was based on her  
10 judgment. That was one of the many unique talents  
11 she had was seeing that and being able to do that.  
12 And then we had some, you know, as you pointed out,  
13 some discussions periodic about direct mail  
14 prospecting, about other ways, you know, but  
15 primarily it was Phyllis.

16 Q. Okay. My question specifically was about  
17 Eagle Forum, okay?

18 A. Yep, c4.

19 Q. Right. Did you understand as a -- when  
20 you were acting as president, that Eagle Forum  
21 received donations from donors across the United  
22 States?

23 A. Did I understand that?

24 Q. Yes.

Edward Martin, Jr.

June 4, 2019

Page 226

1           **A.     I knew we took in -- I knew Phyllis took**  
2       **in money, so donations, whatever it was --**

3           Q.     I'm not talking about Phyllis, Ed. So  
4       just really try to listen to the question, okay?  
5       I'm asking you specifically about Eagle Forum.

6           **A.     Mm-hmm.**

7           Q.     Did you understand that Eagle Forum  
8       received donations annually from donors across the  
9       United States?

10          **A.     And I'm answering. I'm asking you to**  
11       **listen closely. Phyllis received all those. She**  
12       **received lots of contributions, and she made sure**  
13       **they went where they were supposed to. That's how**  
14       **it happened the time -- when I was there. And**  
15       **that's -- so some of them went to Eagle Forum c3.**  
16       **Some went to Eagle Forum Education and Legal Defense**  
17       **Fund.**

18          Q.     So it's your testimony if a donation was  
19       sent to the wrong location, that Phyllis was engaged  
20       in some form of fraud?

21                   MR. ELSTER: Objection. Form.

22                   THE DEPONENT: I'm not sure I  
23       understand.

24                   MR. ELSTER: Mischaracterizes prior

Edward Martin, Jr.

June 4, 2019

Page 227

1 testimony.

2 BY MR. SOLVERUD

3 Q. You're saying that Phyllis was the one  
4 responsible for where the money went?

5 **A. No. I'm just saying Phyllis was**  
6 **responsible for people wanting to give money to our**  
7 **organizations.**

8 Q. And I'm not talking about why people gave  
9 money. I'm talking about money that was received by  
10 Eagle Forum. Not your organizations, just Eagle  
11 Forum. And are you able to -- are you able to say  
12 one way or the other as to whether Eagle Forum  
13 received donations from donors across the United  
14 States?

15 **A. I thought I just said that.**

16 Q. I don't think you did, Ed.

17 **A. Well, Phyllis Schlafly received donations.**  
18 **All of her organizations received donations,**  
19 **including Eagle Forum.**

20 Q. Okay. And Eagle Forum received donations  
21 from donors across the United States, right?

22 **A. We can do this again and again. We**  
23 **received donations from all over the country.**  
24 **Phyllis was the one who we gave to, and our**

Edward Martin, Jr.

June 4, 2019

Page 228

1 **organizations, and that included Eagle Forum.**

2 Q. Did Eagle Forum receive checks made out to  
3 Eagle Forum in donations from people throughout the  
4 United States?

5 **A. I don't know what "throughout the United**  
6 **States" means, but we certainly got donations.**

7 Q. Okay. And you don't know whether those  
8 people -- or you don't know the geographic scope of  
9 the donors? Is that what you're saying?

10 **A. Not sitting here today.**

11 Q. Okay. Well, did Eagle Forum ever limit  
12 its fundraising activities to specific regions or  
13 specific states?

14 MR. ELSTER: Objection. Compound,  
15 and vague.

16 THE DEPONENT: No, not that I can  
17 recall. I'm not sure.

18 BY MR. SOLVERUD

19 Q. You understood that Eagle Forum's  
20 fundraising activities were across the United  
21 States?

22 **A. I don't know what that -- I suppose. We'd**  
23 **be happy to take donations from anybody anywhere.**  
24 **We certainly concentrated on -- there were**

Edward Martin, Jr.

June 4, 2019

Page 229

1 concentrations and pockets, so I don't know. Again,  
2 across the nation, I suppose.

3 Q. You understood that Eagle Forum, when you  
4 were acting as president, would regularly send  
5 updates and news and informations to its members  
6 regardless of where they were in the United States,  
7 correct?

8 A. By email or by mail?

9 Q. Either way.

10 A. Sure.

11 Q. Okay. And you understood that in those  
12 updates, whether they were by mail or email, Eagle  
13 Forum would solicit donations from those members?

14 A. Not every time. It should have been more  
15 times, but, yes, but it would have been all the  
16 organizations would have done that.

17 Q. Okay. And Eagle Forum --

18 MR. SOLVERUD: Hey, John?

19 THE DEPONENT: Flip phone.

20 BY MR. SOLVERUD

21 Q. You understood that the donations that  
22 were received by Eagle Forum were used to fund Eagle  
23 Forum's operations and activities, correct?

24 A. I'm sorry. Say that again.

Edward Martin, Jr.

June 4, 2019

Page 230

1 THE REPORTER: "You understood that  
2 the donations that were received by Eagle Forum were  
3 used to fund Eagle Forum's operations and  
4 activities, correct?"

5 MR. ELSTER: We need a break  
6 when -- finish the question.

7 THE DEPONENT: I would say that the  
8 money that Phyllis Schlafly raised for Eagle Forum  
9 funded its operations.

10 MR. SOLVERUD: We can take a break.

11 THE VIDEOGRAPHER: We're off the  
12 record at 2:40 p.m.

13 (Whereby a short break was taken.)

14 THE VIDEOGRAPHER: We are back on the  
15 record at 2:55 p.m.

16 BY MR. SOLVERUD

17 Q. When you were acting as president of Eagle  
18 Forum, Ed, is it true that Eagle Forum would send  
19 letters that were signed by Phyllis Schlafly asking  
20 for donations to different causes or campaigns that  
21 were based on current events at the time?

22 MR. ELSTER: Objection. Form,  
23 compound.

24 THE DEPONENT: On behalf -- I'm



Edward Martin, Jr.

June 4, 2019

Page 231

1       sorry. Can you read that back? I'm sorry.

2                       THE REPORTER: "When you were acting  
3       as president of Eagle Forum, Ed, is it true that  
4       Eagle Forum would send letters that were signed by  
5       Phyllis Schlafly asking for donations to different  
6       causes or campaigns that were based on current  
7       events at the time?"

8                       MR. ELSTER: Same objection.

9                       THE DEPONENT: Letters -- yeah,  
10       Phyllis would send letters for contributions to  
11       Eagle Forum based -- Eagle Forum c4 based on issues.  
12       I just didn't know if you meant that letters would  
13       go out for other causes that they were separate from  
14       Eagle Forum c4.

15       BY MR. SOLVERUD

16               Q. I'm talking about the letters that Eagle  
17       Forum paid the expenses of sending. You understood  
18       that Eagle Forum paid to send letters that were  
19       signed by Phyllis Schlafly to solicit donations,  
20       correct?

21               A. Yes, I think so. I think so.

22               Q. Now, you also understand that the bylaws  
23       of Eagle Forum provide for state Eagle Forums or  
24       state chapters? Are you familiar with that?

Edward Martin, Jr.

June 4, 2019

Page 232

1 MR. ELSTER: You can look at it.

2 THE DEPONENT: Yeah. One confusion  
3 was the earlier document referred to clubs. That  
4 was the first time I'd seen that, but there  
5 are -- in the bylaws, there is discussion of  
6 chapters, yes.

7 BY MR. SOLVERUD

8 Q. Okay. And the state Eagle Forum chapters  
9 were led by state presidents or Eagle leaders; isn't  
10 that right?

11 A. In my time, it was the -- it depended on  
12 the state, and some leaders didn't lead a chapter.  
13 Some were just leaders in states. It didn't -- it  
14 depended. It was not as delineated as "here is a  
15 chapter in a state."

16 Q. And the leaders within a state would be  
17 referred to as "Eagle leaders"; isn't that right?

18 A. Phyllis had leaders in every -- in many  
19 states who she called "leaders." It was not  
20 always -- it wasn't clear often if they were leaders  
21 of chapters. There may not have been a chapter, or,  
22 in fact, if they were Eagle Forum c4 leaders or  
23 doing other work. It just depended on each state by  
24 state.

Edward Martin, Jr.

June 4, 2019

Page 233

1 Q. The -- to the extent there were Eagle  
2 Forum c4 leaders, they were referred to as "Eagle  
3 leaders"; isn't that right?

4 A. I think -- I think so. Although there may  
5 have been overlap with -- the term "Eagle leaders"  
6 may have included others, but maybe so.

7 Q. And did you understand that the state  
8 organizations, chapters, whatever you want to call  
9 them, were an essential part of Phyllis Schlafly's  
10 vision for Eagle Forum --

11 MR. ELSTER: Objection.

12 BY MR. SOLVERUD

13 Q. -- at the grassroots level?

14 MR. ELSTER: Objection. Speculation.  
15 Form, vague.

16 THE DEPONENT: In my time with  
17 Phyllis, 25 years after that booklet you gave me and  
18 the bylaws, her Eagle leaders in states -- some were  
19 state leaders. Some were national issue leaders.  
20 Some were chapter leaders. So having grassroots  
21 people across the country was an integral part of  
22 her work. It's not -- it wasn't as delineated that  
23 all of them were Eagle Forum c4. Some of them were  
24 independents. Some of them had started their own

Edward Martin, Jr.

June 4, 2019

Page 234

1 organization. So it was a little bit less formal.

2 BY MR. SOLVERUD

3 Q. Within Eagle Forum, the work to be done  
4 was intended to be done at the state and local  
5 levels; isn't that right?

6 **A. Within Eagle Forum?**

7 Q. Mm-hmm.

8 **A. No, that's not right.**

9 Q. Okay. Did you understand that when you  
10 were acting as president, that the national Eagle  
11 Forum was intended to provide resources, and  
12 education, support, and funding to support the state  
13 and local organizations?

14 MR. ELSTER: Objection. Compound.

15 THE DEPONENT: I saw it differently.

16 BY MR. SOLVERUD

17 Q. And how did you see it?

18 **A. Phyllis was a national leader who**  
19 **encouraged and grew leaders at every**  
20 **level -- federal, state, and local. And to varying**  
21 **degrees, her policy preferences or projects were**  
22 **taken up by some people and her Eagle leaders and**  
23 **Eagle groups, and other times they were doing their**  
24 **own things consisting with where they were. So it**

Edward Martin, Jr.

June 4, 2019

Page 235

1 was not -- it was neither top down, nor bottom up.  
2 It was more of this sort of affiliation with Phyllis  
3 and then moving that way.

4 Q. Did you understand -- we talked  
5 about -- we talked about the Eagle Forum name. Do  
6 you remember that?

7 A. Uh-huh.

8 Q. Okay. Do you understand that there was a  
9 tradename or a service mark that was obtained on  
10 the -- for Eagle Forum?

11 A. I have learned that, yes.

12 (Plaintiff's 5, previously marked, was  
13 identified for the record.)

14 BY MR. SOLVERUD

15 Q. Okay. Let me show you what's been marked  
16 in another deposition as Exhibit 5.

17 MR. ELSTER: I've got that one.

18 MR. SOLVERUD: Okay.

19 BY MR. SOLVERUD

20 Q. Can you identify Exhibit 5 as the Eagle  
21 Forum trademark registration?

22 A. I take your word for it. I don't know.  
23 Maybe I've seen it before, and I don't know to say  
24 for sure, but that's what it looks like.

Edward Martin, Jr.

June 4, 2019

Page 236

1 Q. Okay. You understood that the work that  
2 Eagle Forum was doing -- it was doing under the  
3 tradename or the service mark, "Eagle Forum," as  
4 reflected in Exhibit 5, correct?

5 MR. ELSTER: Objection. Form.

6 THE DEPONENT: I was told by Phyllis  
7 that this was an error. It shouldn't have been c4's  
8 property, that Eagle Forum was her property, and  
9 that it encompassed a lot of her work, as evidenced  
10 by the use of the name by the c3 and c4 in the PAC.  
11 So it's this description is what it is, but that's  
12 not how I understood what the work we were doing,  
13 so.

14 BY MR. SOLVERUD

15 Q. Regardless of what Phyllis may have told  
16 you or understood, you understand that when it came  
17 to the c4, the work that the c4 was doing was  
18 doing -- it was doing under the name "Eagle Forum"?

19 A. That the work that was being done, there  
20 was Eagle Forum, Eagle Forum Education and Legal  
21 Defense Fund, and Eagle Forum PAC. So, yes. You  
22 asked about the description. I was trying to be  
23 careful about what I think the description is.

24 Q. Actually, I didn't ask about the

Edward Martin, Jr.

June 4, 2019

Page 237

1 description, but be that as it may.

2 Sir, you understood that Eagle  
3 Forum -- Eagle Forum never did any work under any  
4 name other than Eagle Forum?

5 **A. I don't know that.**

6 Q. You don't know that one way or the other?

7 **A. Phyllis was big on names changing. Stop**  
8 **ERA turned into different things, and, you know, the**  
9 **Eagles were used in the '60s. So I don't know.**  
10 **When she was alive, again, Eagle Forum Education and**  
11 **Legal Defense Fund, she was adamant that was the**  
12 **name for that. So I don't know. I don't know what**  
13 **that means.**

14 Q. Well, and I'm not asking about Eagle Forum  
15 Education and Legal Defense Fund.

16 **A. Okay.**

17 Q. I'm just asking about Eagle Forum c4. Are  
18 you aware during your time acting as president that  
19 Eagle Forum ever operated under any name other than  
20 Eagle Forum?

21 **A. During my time?**

22 Q. Yes.

23 **A. No, sir.**

24 Q. Okay. And are you aware at any time Eagle

Edward Martin, Jr.

June 4, 2019

Page 238

1 Forum operating under any trademark or registration  
2 other than Exhibit 5?

3 A. Well, this was only filed in 2001, right?  
4 So I'm aware as a matter of the organization's  
5 history that before this, it was operating without  
6 that register.

7 Q. And all -- because to your point, I'm  
8 asking only about when you were acting as president.

9 A. Oh, okay.

10 Q. Okay? When you were acting as president,  
11 isn't it true that Eagle Forum was acting pursuant  
12 to or under the trademark registration reflected in  
13 Exhibit 5?

14 A. Yes. However, I only saw this after the  
15 lawsuits. I didn't realize there was a trademark  
16 for any of the -- in any use, so.

17 Q. You understood that while you were acting  
18 as president, that Eagle Forum used the Eagle Forum  
19 mark in registration in connection with its  
20 grassroots advocacy efforts that it was engaged in,  
21 in the United States, correct?

22 A. Well, I was not aware that we had -- that  
23 there was a trademark. I was told what we used for  
24 the names and marks and all, and that there was a



Edward Martin, Jr.

June 4, 2019

Page 239

1 registered trademark is something I became aware of  
2 later in my tenure. Probably during the lawsuit.  
3 So before that, I operated on the instruction of  
4 Phyllis and John on how to use that, which all the  
5 boards had -- in my time had operated under without  
6 incident.

7 Q. Eagle Forum, in connection with its  
8 grassroots advocacy efforts across the United  
9 States, always operated as Eagle Forum? We can  
10 agree with that, correct?

11 A. Again, you're going back in time.

12 Q. While you were acting as president.

13 A. Oh. When I was acting as president, Eagle  
14 Forum used that name? Is that what you're asking?

15 Q. Yes.

16 A. Yes. Yes, I agree.

17 Q. Have you ever reviewed any of the  
18 bylaws -- strike that.

19 Have you reviewed any of the meeting  
20 minutes prior to your joining Eagle Forum which  
21 reflect the discussion of the Eagle Forum  
22 registration?

23 A. Not that I recall.

24 Q. Okay. So in connection with your work for

Edward Martin, Jr.

June 4, 2019

Page 240

1 Eagle Forum, you've never gone back and said, "Okay.  
2 I'm going to try to figure out when this  
3 registration came back. I'm going to look at the  
4 bylaws"? You never did that?

5 **A. Well, no. That's a different conclusion.**

6 Q. Okay.

7 **A. No. When this came up, there's been**  
8 **litigation around this topic, and so there's been**  
9 **lots of discussion and lots of --**

10 Q. I'm not asking about discussion.

11 **A. I know, but hold on.**

12 Q. I'm trying to help you, Ed. Real quick.  
13 Just listen for a second.

14 **A. Okay.**

15 Q. I'm trying to find out if I should be  
16 asking you questions about the meeting minutes. And  
17 so did you go back as part of your work in this case  
18 or as your work as on behalf of Eagle Forum, did you  
19 go back and try to look at the minutes to try to  
20 find out what happened with the registration?

21 **A. I can't say that I recall that.**

22 Q. Okay.

23 **A. At this time.**

24 Q. Okay.

Edward Martin, Jr.

June 4, 2019

Page 241

1           **A.     I just don't know.**

2           Q.     Okay. And I'm not going to ask you about  
3 meeting minutes if you weren't a board member at the  
4 time or an officer that predate your involvement if  
5 you never went back and looked at them.

6                     Have you been a part of any conversations  
7 with anybody, other than your lawyers, where you  
8 discussed the circumstances surrounding the  
9 registration of the Eagle Forum trademark?

10          **A.     Phyllis and John.**

11          Q.     Okay. And what did you discuss with John  
12 specifically?

13          **A.     It's hard for me to recall the specifics.**  
14 **At the time that that came up is what I recall**  
15 **Phyllis' -- the time I became aware of the**  
16 **trademark, which was around the time of the**  
17 **attempted takeover, I think Phyllis was frustrated**  
18 **with how the mark -- where the mark was filed.**  
19 **That's how I recall that.**

20          Q.     While you were acting as president, you  
21 used the Eagle Forum name on a national level,  
22 correct?

23          **A.     Yeah. I suppose in whatever context, yes.**

24          Q.     While you were acting as president, you

Edward Martin, Jr.

June 4, 2019

Page 242

1 used the Eagle Forum name in connection with Eagle  
2 Forum's efforts to engage in different types of  
3 social welfare activities, correct?

4 MR. ELSTER: Objection. Form. Vague  
5 as to "social welfare."

6 THE DEPONENT: Use the name? Sorry.

7 THE REPORTER: "While you were acting  
8 as president, you used the Eagle Forum name in  
9 connection with Eagle Forum's efforts to engage in  
10 different types of social welfare activities,  
11 correct?"

12 THE DEPONENT: I think so.

13 BY MR. SOLVERUD

14 Q. When you were acting as president, you  
15 used the Eagle Forum name on solicitations to Eagle  
16 Forum members, correct?

17 A. I -- "solicitations" is a funny word to  
18 me, but I think to our folks, broadly I used that  
19 title in the name.

20 Q. You used the "Eagle Forum" name on  
21 communications and correspondence with members of  
22 the organization, correct?

23 A. With -- yeah, with our Eagles. I don't  
24 know specifically the members, again, is a question

Edward Martin, Jr.

June 4, 2019

Page 243

1 of some dispute.

2 Q. You used the "Eagle Forum" name on the  
3 website, www.eagleforum.org, correct?

4 A. Yes.

5 Q. While you were acting as president, you  
6 used the "Eagle Forum" name at the Eagle Council  
7 events, correct?

8 A. That sounds -- yes, that sounds right.

9 Q. And while you were acting as president,  
10 you used the "Eagle Forum" name to promote Eagle  
11 Forum and its various causes, correct?

12 A. Sounds correct, yes.

13 Q. And while you were acting as president,  
14 you received donations at Eagle Forum from  
15 supporters, whether they are members or Eagles or  
16 whatever you call them, correct?

17 A. I think that's correct. I would say, when  
18 you say, "at Eagle Forum," certainly people that  
19 supported our work gave us donations, and that would  
20 be to Eagle Forum's -- to the c4, yes.

21 Q. And you would agree with me that, you  
22 know, at least up until early 2016, Eagle Forum was  
23 a very successful organization, correct?

24 MR. ELSTER: Objection. Vague as to

Edward Martin, Jr.

June 4, 2019

Page 244

1 "success."

2 THE DEPONENT: I would agree that  
3 everything that Phyllis Schlafly did was very  
4 successful, including Eagle Forum c4.

5 BY MR. SOLVERUD

6 Q. Would you agree that Eagle Forum, the name  
7 "Eagle Forum" earned a reputation for integrity  
8 amongst donors and supporters?

9 MR. ELSTER: Objection. Form.  
10 Vague, and calls for speculation.

11 THE DEPONENT: I think, again, that  
12 was Phyllis' reputation and carried over to all her  
13 organizations. So, yeah, sure.

14 BY MR. SOLVERUD

15 Q. Okay. And you agree that Eagle Forum had  
16 a good reputation when it came to issues like  
17 family, integrity, and individual liberty, and the  
18 public and private virtue, and things of that  
19 nature?

20 MR. ELSTER: Same objections.

21 THE DEPONENT: I'm not sure that list  
22 is -- is that a list of something I should be aware  
23 of that sounds --

24 / / /

Edward Martin, Jr.

June 4, 2019

Page 245

1 BY MR. SOLVERUD

2 Q. Let me ask it a different way because we  
3 talked about the list. We talked about the  
4 principles and purposes.

5 A. Yeah, that's right.

6 Q. So we can agree, can't we, that Eagle  
7 Forum developed a reputation for integrity as to the  
8 principles and purposes that we talked about  
9 previously?

10 A. That's fair, yes.

11 MR. ELSTER: Speculation.

12 THE DEPONENT: That's fair, yes.

13 BY MR. SOLVERUD

14 Q. Okay. You agree that the "Eagle Forum"  
15 name is famous?

16 MR. ELSTER: Objection. Speculation.  
17 To the extent it calls for a legal conclusion.

18 THE DEPONENT: I think everything  
19 Phyllis Schlafly touched is pretty famous, but  
20 it's -- yeah. I mean, the phrase "Eagle Forum,"  
21 whether used the Eagle Education and Legal Defense  
22 Fund or Eagle Forum. Pretty famous, yes.

23 BY MR. SOLVERUD

24 Q. You would agree that the name "Eagle

Edward Martin, Jr.

June 4, 2019

Page 246

1 Forum" has got national recognition?

2 MR. ELSTER: Same objection.

3 THE DEPONENT: To some extent.

4 BY MR. SOLVERUD

5 Q. Would you agree that the name "Eagle  
6 Forum" has value?

7 MR. ELSTER: Same objection. And  
8 foundation as to "value."

9 THE DEPONENT: I think -- yeah, I'm  
10 not sure I know how to value it, but I would say  
11 it's -- there's a value to it, sure.

12 BY MR. SOLVERUD

13 Q. Okay. And have you ever been involved in  
14 any conversations or discussions about what the  
15 value of the name "Eagle Forum" is?

16 MR. ELSTER: Objection to the extent  
17 it calls for discussions with his lawyers.

18 But you can answer.

19 BY MR. SOLVERUD

20 Q. Yeah, subject to that.

21 MR. ELSTER: Yeah.

22 THE DEPONENT: I'm not sure. I don't  
23 recall that. I don't know. I don't recall that.

24 / / /



Edward Martin, Jr.

June 4, 2019

Page 247

1 BY MR. SOLVERUD

2 Q. Have you ever had any conversations with  
3 any of the Schlafly brothers about what the value is  
4 of the name "Eagle Forum"?

5 A. Not that I recall.

6 Q. When you were involved with Eagle Forum,  
7 there was a website at www.eagle forum.org, right?

8 A. Correct.

9 (Plaintiff's Exhibit 8, previously marked,  
10 was identified for the record.)

11 BY MR. SOLVERUD

12 Q. Let me show you what's been marked as  
13 Exhibit 8. Exhibit 8 is certain captures from the  
14 Eagle Forum website, www.eagleforum.org, as of  
15 Thursday, May 12, 2016. I'll represent that to you.  
16 You can see that's down at the bottom. Do you  
17 recognize any of these captures on Exhibit 8?

18 A. Let me look here. Okay.

19 Q. Do you recognize any of these captures on  
20 Exhibit 8?

21 A. Oh, is "capture" a word for, like, "screen  
22 shots"?

23 Q. Yes, yeah. That's a better word.

24 A. Yeah, it looks familiar. I mean, it looks

Edward Martin, Jr.

June 4, 2019

Page 248

1 like the shots of the website. I think that's  
2 right.

3 Q. And did you have any role or involvement  
4 in the creation of Eagle Forum website?

5 A. The Eagle Forum website was maintained by  
6 the Eagle Trust employees, and we really -- I didn't  
7 have a lot of role in forming it. We had stuff  
8 posted to it for people to refer to, but -- so it  
9 was -- existed before my time and kind of in a  
10 certain format.

11 Q. You understood that, among other things,  
12 the Eagle Forum website was used by Eagle Forum to  
13 market and promote its advocacy efforts and causes,  
14 correct?

15 A. Eagleforum.org was used by all of Phyllis'  
16 organizations. It was a place that she used as an  
17 address from which her organizations could -- and  
18 her writings and her radio and her stuff could all  
19 be sort of a center of hub of a wheel.

20 Q. And you understood that Eagle Forum used  
21 the eagleforum.org website to promote its activities  
22 separate and apart from the other activities that  
23 the other organizations may be promoting, correct?

24 A. Correct.

Edward Martin, Jr.

June 4, 2019

Page 249

1 Q. And by way of example, if I wanted to buy  
2 the Eagle Forum membership pin, I could go to the  
3 website and buy the pin, correct?

4 A. You could go to the -- but that's not a  
5 distinct Eagle Forum c4 function. That's, again, a  
6 Phyllis Schlafly organizations, all her stuff,  
7 function. So, but, yes that's something that was  
8 there.

9 Q. Okay. So I mean, on the last page of  
10 Exhibit 8, there's a reference to the Eagle Forum  
11 membership pin.

12 A. Uh-huh.

13 Q. There's a way to go about purchasing that,  
14 correct?

15 A. That's on the last page, yes, sir.

16 Q. Okay. And if I wanted to become a member  
17 of Eagle Forum, I could go to the website and pay to  
18 become a member; isn't that right?

19 A. Again, I take your word for it based on  
20 what you're giving me here from a long time ago, but  
21 I think that's right. Where is that? Is that on  
22 one of those pages?

23 Q. Yes.

24 A. It's page --

Edward Martin, Jr.

June 4, 2019

Page 250

1 Q. There's --

2 A. Oh, there's an email, an email.

3 Q. Right. There's multiple different links  
4 that you could go to, but, you know, for example, on  
5 the first page, you know, you could click on "join  
6 Eagle Forum." Do you see that?

7 A. Yes.

8 Q. Right in the middle?

9 A. That's a hot link.

10 Q. Yes. And then if you go to the second  
11 page, there's a reference to membership. Do you see  
12 that? Membership, Phyllis Schlafly Report  
13 subscription, Education Reporter subscription?

14 A. Uh-huh.

15 Q. And if you go to the third page, at the  
16 top, you see a reference to "become a member of  
17 Eagle Forum"?

18 A. Yes, sir.

19 Q. And if you go to the seventh page, it  
20 talks about the benefits of joining Eagle Forum,  
21 correct?

22 A. I'm not seeing that one. Seven -- mine's  
23 not numbered.

24 Q. Yeah. It is that one.

Edward Martin, Jr.

June 4, 2019

Page 251

1           **A.     Okay.   All right.**

2           Q.    Do you see that?

3           **A.     Sure.**

4           Q.    And it says, "Yes, I want to join," and it  
5 talks about -- there's a link to membership.

6           **A.     Yes.**

7           Q.    Okay. On the next page, there's -- there  
8 was a page for the various Eagle Forum state  
9 leaders; is that right?

10          **A.     Well, this -- yes, this is a page of Eagle**  
11 **Forum -- looks like presidents. Some are state**  
12 **leaders. Some are others, I guess.**

13          Q.    Mm-hmm. And provided contact information  
14 for the various --

15          **A.     It looks like --**

16          Q.    -- state leaders.

17          **A.     Some or most of them, yeah.**

18          Q.    Let me ask you some questions about the  
19 radio show. What was the radio show called?

20          **A.     Which radio show?**

21          Q.    That's a good -- the Eagle Forum, Eagle  
22 Forum live radio show, correct?

23          **A.     The Saturday show? Saturday morning show?**

24          Q.    Right.

Edward Martin, Jr.

June 4, 2019

Page 252

1           **A.     "Eagle Forum Live"? I think so.**

2           Q.     Do you know how that was broadcast? Like,  
3     what the range was? If you have any knowledge of  
4     that.

5           **A.     The radio program was primarily on the**  
6     **Bott Radio Network. So if you looked at the Bott**  
7     **Radio Network footprint -- I don't know what that**  
8     **is. At various times -- I think before my time, it**  
9     **had been broadcast on other entities also, but it**  
10    **would have been mostly the Bott Radio Network.**

11          Q.     And while you were acting as president of  
12    Eagle Forum, were you ever aware of any revenues  
13    generated from the Eagle Forum radio show?

14          **A.     No, sir.**

15          Q.     One way or the other, you don't have any  
16    information?

17          **A.     I wasn't aware, yes.**

18          Q.     And while you were acting as president of  
19    Eagle Forum, did you have any information about how  
20    the Eagle Forum live radio show was funded, paid  
21    for?

22          **A.     No, sir.**

23          Q.     On April 11, 2016, you agreed with John  
24    Schlafly, Andy Schlafly, and Bruce Schlafly to form

Edward Martin, Jr.

June 4, 2019

Page 253

1 a new 501(c)(4) entity to replace Eagle Forum; isn't  
2 that right?

3 MR. ELSTER: Objection. Form.

4 THE DEPONENT: No, sir.

5 BY MR. SOLVERUD

6 Q. You never did that?

7 A. To replace Eagle Forum? That would  
8 be -- I think that's a mischaracterization, but so  
9 that's what I heard you say.

10 Q. On April 11, 2016, did you enter into an  
11 agreement with John Schlafly, Andy Schlafly, and  
12 Bruce Schlafly to create a new c4 entity?

13 A. I don't know what "enter into an  
14 agreement" with those gentlemen means. Can you  
15 clarify that?

16 Q. Well, did you agree with John and Andy and  
17 Bruce to form a new c4 entity?

18 A. I didn't enter into an agreement if that's  
19 what you mean. If that's what your question is, the  
20 answer is "no."

21 Q. Did you ever enter into any form of an  
22 agreement with John, Bruce, Andy, or anybody else to  
23 create a c4 entity?

24 A. Not that I recall, agreement. I don't

Edward Martin, Jr.

June 4, 2019

Page 254

1 know. I guess I'm struggling to understand the use  
2 of that word, but I don't think so.

3 Q. Okay. Did you ever agree with John  
4 Schlafly, Andy Schlafly, Bruce Schlafly, or John  
5 Schlafly to create a new c4 entity?

6 A. Again, I -- there wasn't a c4 created. I  
7 don't know -- I don't think there was some sort of  
8 an agreement entered into with anyone.

9 Q. I tried to get away from the word  
10 "agreement," but I used the word "agree." Did you  
11 guys ever agree that that's what we're going to do?

12 A. I agreed with Phyllis, that that's what we  
13 should do, but not to replace Eagle Forum c4. That  
14 was not what happened.

15 (Plaintiff's Exhibit 89 was marked for  
16 identification.)

17 BY MR. SOLVERUD

18 Q. Let me show you a document marked as  
19 Exhibit 89. Let me know after you've had a chance  
20 to read it.

21 A. Yep. I'm fine.

22 Q. You're good?

23 A. I'm ready. Yes.

24 Q. Okay. On April 11th at 10:43 p.m., Andy



Edward Martin, Jr.

June 4, 2019

Page 255

1 Schlafly wrote an email that says, "A three-pronged  
2 approach is needed. 1. Ignore the gang of six and  
3 their invalid board meeting and their letter demands  
4 that follow from it. 2. Litigate. 3. Start a new  
5 c4 using mother's name. I suggest 'Phyllis Schlafly  
6 Forum.'" Did I read that correctly?

7 **A. Yes, sir.**

8 Q. The entity that he's suggesting here, as  
9 Phyllis Schlafly Forum, eventually got named  
10 "Phyllis Schlafly's American Eagles"; isn't that  
11 right?

12 **A. No, sir.**

13 Q. So when you -- when he says, "I suggest we  
14 start a new c4 using mother's name," that's not a  
15 reference to what eventually became Phyllis  
16 Schlafly's American Eagles?

17 **A. That's Andy describing his ideas for an**  
18 **approach. So I don't -- there later became a c4. I**  
19 **don't know if that was the -- you know,**  
20 **I don't -- there wasn't a Phyllis Schlafly Forum to**  
21 **become something else, which is what you asked. So**  
22 **this is a conversation between -- I guess it's Andy**  
23 **and John and Bruce. So there's back and forth.**

24 Q. You don't think you were a part of this

Edward Martin, Jr.

June 4, 2019

Page 256

1 conversation?

2 A. No, no. I'm on there. I'm on the email  
3 at the top. I'm not sure if I was on earlier, but  
4 I'm on the top of it.

5 Q. Did you agree with Andy's proposed  
6 three-prong approach?

7 A. No. I don't recall working through his  
8 three-pronged approach. I don't know if it -- we  
9 were in the midst -- I was -- Phyllis was alive. I  
10 was talking to Phyllis and John about this as much  
11 as hearing from Andy on an email.

12 Q. So did you agree with Andy's proposed  
13 three-pronged approach?

14 MR. ELSTER: Objection to the extent  
15 it was asked and answered.

16 THE DEPONENT: Yeah, I don't recall  
17 having any response or reaction to his three-pronged  
18 approach at that time.

19 BY MR. SOLVERUD

20 Q. Okay. There's a series of emails here.  
21 Phyllis Schlafly is not copied on these emails,  
22 correct?

23 A. Mm-hmm. It doesn't look like it.  
24 Although it's hard to tell with the two below

Edward Martin, Jr.

June 4, 2019

Page 257

1 doesn't seem to show who was copied, but it doesn't  
2 look like it.

3 Q. Your email dated April 11, 2016 says, "One  
4 of our savvy supporters has a c4 already  
5 operation -- operational and will give it to us  
6 tomorrow if we ask." Did I read that correctly?

7 A. Yes, sir.

8 Q. You didn't include Phyllis Schlafly on  
9 that email, correct?

10 A. It doesn't look like it, no.

11 Q. And the savvy supporter that you're  
12 referring to is Bill Wilson, correct?

13 A. I think so. I don't know of anybody else  
14 who would have one, but I'm not sure. I don't know  
15 for sure in time.

16 Q. And the c4 that was already operational  
17 was Citizen Empowerment League, correct?

18 A. Again, I think so, but I'd have to be sure  
19 on the timing. I don't know what else was -- we  
20 had -- Phyllis had knew that she didn't want to be  
21 silenced at the time for the Trump agenda in the  
22 next six months before the most important election  
23 in a long time. So we were trying to find ways to  
24 move ahead, and that's what is going on here.

Edward Martin, Jr.

June 4, 2019

Page 258

1 Q. And you said that "He'll give it to us if  
2 we ask," referring to Bill Wilson giving you Citizen  
3 Empowerment League, correct?

4 A. As I said, I don't -- I think so, but I'm  
5 not sure. The timing is -- I'd have to be refreshed  
6 on it. I don't know who else we had. There were  
7 people that were offering to help us because they  
8 saw what was happening, but I think it was probably  
9 that one.

10 Q. Did anybody else, other than Bill Wilson,  
11 offer you a c4?

12 A. I don't recall that, no.

13 Q. And, in fact, you did ask Bill Wilson for  
14 control of Citizen Empowerment League, correct?

15 A. I don't think that would be the way I'd  
16 say it. We asked for help, and we ended up  
17 utilizing that organization.

18 Q. Let's use your words. You asked Bill  
19 Wilson to give you Citizen Empowerment League,  
20 correct?

21 A. I don't know. I don't recall that, how  
22 the exchange was. We ended up forming a new c4 with  
23 that successor to that organization.

24 Q. Citizen Empowerment League?

Edward Martin, Jr.

June 4, 2019

Page 259

1           **A.     Correct.**

2           Q.     So Bill Wilson gave you Citizen  
3 Empowerment League, correct?

4           **A.     The phrase is a funny one, but I mean,**  
5 **certainly he was our -- he was a help in that, and**  
6 **that's how it happened. We still had to do certain**  
7 **things to move ahead.**

8           Q.     You didn't pay him for it, right?

9           **A.     I don't think there was any payment. I'm**  
10 **not sure about how in terms of the work he did for**  
11 **us.**

12          Q.     And, in fact, he gave you a bank account  
13 with Citizen Empowerment League, correct?

14          **A.     I don't remember that. The bank account?**  
15 **I'm not sure if we started one, or maybe there is**  
16 **one. I'm not sure.**

17          Q.     I think you testified earlier that the  
18 BB&T bank account --

19          **A.     If that's it --**

20                   MR. ELSTER: Objection to the extent  
21 it mischaracterizes his prior testimony.

22                   THE DEPONENT: I just don't know what  
23 that -- I don't know what -- I don't recall what the  
24 specifics of how that went about, but especially

Edward Martin, Jr.

June 4, 2019

Page 260

1 related to this email.

2 BY MR. SOLVERUD

3 Q. So Bill Wilson gave you Citizen  
4 Empowerment League and a bank account with a nominal  
5 amount of money in it, which you then renamed  
6 "Phyllis Schlafly American Eagles," correct?

7 MR. ELSTER: Object to form and  
8 foundation.

9 THE DEPONENT: We -- Phyllis, me,  
10 John, others knew -- thought we needed a vehicle to  
11 continue Phyllis' advocacy for Trump in what we were  
12 doing, and we went, and we had people that could  
13 help us figure that out, and one of them was Bill,  
14 and that's how we got to that point.

15 BY MR. SOLVERUD

16 Q. Did you disclose anything about Exhibit 89  
17 to the Eagle Forum board of directors?

18 **A. To its chairman, Phyllis.**

19 Q. Did you disclose to the entire board  
20 anything about Exhibit 89?

21 **A. That was how the board operated.**

22 Q. So, no?

23 **A. The board operated -- when I disclosed to**  
24 **the chairman, she took care of that if she wanted**

Edward Martin, Jr.

June 4, 2019

Page 261

1 to. She talked to her board members, and so that  
2 was not a role that I would have played in that  
3 case.

4 Q. Are you aware of any disclosure that was  
5 made to the entire board of directors of Eagle Forum  
6 regarding this new opportunity to set up a c4 by  
7 taking Citizen Empowerment League and changing it to  
8 PSAE?

9 MR. ELSTER: Objection. Form. It  
10 calls for a legal conclusion as to "opportunity."

11 THE DEPONENT: I'm aware that Phyllis  
12 talked to her board members of that organization.

13 BY MR. SOLVERUD

14 Q. Well, were you part of any meeting where  
15 this was disclosed?

16 A. Not that I recall.

17 Q. And it's your position you would have had  
18 to have convene the board meeting and lead the board  
19 meeting; isn't that right?

20 A. If there was a board meeting, that's  
21 right, since I'm the president.

22 Q. So you didn't -- you never convened a  
23 board meeting to discuss this opportunity, did you?

24 MR. ELSTER: Objection. Form, and

Edward Martin, Jr.

June 4, 2019

Page 262

1 legal conclusion as to "opportunity."

2 THE DEPONENT: Phyllis, as a  
3 chairman, was the one who would communicate to her  
4 board members. It would not -- it does not even  
5 strike me -- it doesn't strike me. I don't know at  
6 the time that we would have thought, "Let's convene  
7 a board meeting about that."

8 The c4 board had a -- the Eagle Forum  
9 c4 had a problem with Phyllis, and Phyllis wanted  
10 her voice heard, and that's what we were working on.  
11 So it was a separate consideration. But I think  
12 Phyllis still talked to many of her board members of  
13 Eagle Forum c4.

14 BY MR. SOLVERUD

15 Q. Your position in other litigation is that  
16 in order for a board meeting to take place, you  
17 would have to convene and lead it, correct?

18 A. That is correct. That's the bylaws.

19 Q. You never convened a board meeting about  
20 the creation of Phyllis Schlafly's American Eagles?

21 A. Correct.

22 Q. You never disclosed the opportunity that  
23 your savvy supporter had to anybody, other than  
24 Phyllis Schlafly, on the Eagle Forum board?



Edward Martin, Jr.

June 4, 2019

Page 263

1           **A.     That's the big one.**

2                       MR. ELSTER:   Objection.   Form and  
3   legal conclusion as to "opportunity."

4                       THE DEPONENT:   Well, that's the big  
5   one.   The chairman of the board is Phyllis.   So  
6   that's -- that is the person that would know about  
7   it and would understand.   But it's also, just to  
8   tell you, there's not -- I'm not sure how -- it's  
9   not an opportunity for the Eagle Forum c4 to start  
10   another c4 would be one of the reasons.   This was a  
11   separate effort to make her voice known in the face  
12   of opposition.

13   BY MR. SOLVERUD

14           Q.     Why was it not an opportunity?

15           **A.     Eagle Forum c4 already had a c4.   They**  
16   **were one.**

17           Q.     You testified they couldn't form another  
18   c4?

19           **A.     Well, it would be -- I guess you're right,**  
20   **but I mean, they didn't have an interest in**  
21   **promoting Trump's agenda at that point, so.**

22           Q.     And, in fact, you were a part of a c4,  
23   president of the c4 creating another c4, and serving  
24   as president of two c4s at the same time, correct?

Edward Martin, Jr.

June 4, 2019

Page 264

1           **A. Well, that's ended up -- that ended up**  
2           **being what happened, yes.**

3           Q. And you thought that was appropriate,  
4           correct?

5                       MR. ELSTER: Objection to form.  
6           Vague.

7                       THE DEPONENT: That's  
8           Phyllis' -- that's how Phyllis, what she wanted to  
9           do, and that's -- there was nothing inappropriate  
10          about that.

11          BY MR. SOLVERUD

12          Q. It's something you wanted to do, too,  
13          correct?

14          **A. Well, it's -- what's the question?**

15          Q. You wanted to do it, too, correct?

16          **A. I wanted to get Phyllis' voice for the**  
17          **pro-Trump agenda heard, yes.**

18          Q. Yeah.

19                       MR. ELSTER: Can he use the bathroom  
20          real quick?

21                       THE VIDEOGRAPHER: Off the record at  
22          3:34 p.m.

23                       (Whereby a short break was taken.)

24                       THE VIDEOGRAPHER: We're back on the

Edward Martin, Jr.

June 4, 2019

Page 265

1 record at 3:45 p.m.

2 BY MR. SOLVERUD

3 Q. Ed, did you ever agree with any of the  
4 Schlafly brothers to form a new 501(c)(4)  
5 organization to replace Eagle Forum?

6 MR. ELSTER: Objection. Asked and  
7 answered, vague as to "replace."

8 THE DEPONENT: I guess I agreed. I'm  
9 not sure what that means, but I agreed with at that  
10 time when we formed a c4, it was what Phyllis  
11 wanted, and I think most of her family wanted. I'm  
12 not sure about a specific agreement.

13 BY MR. SOLVERUD

14 Q. Did you ever agree with any of the  
15 Schlafly brothers to divert membership leadership  
16 and donations from Eagle Forum into a 501(c)(4)  
17 organization?

18 A. No, sir.

19 Q. Did you ever agree with any of the  
20 Schlafly brothers to attempt to delegitimize the  
21 majority directors, and harm the reputations and  
22 standing with Eagle Forum in their respective  
23 politically conservative and religious communities?

24 MR. ELSTER: Objection. Vague.

Edward Martin, Jr.

June 4, 2019

Page 266

1 Compound.

2 THE DEPONENT: I'm not sure. Can you  
3 read it back?

4 BY MR. SOLVERUD

5 Q. Did you ever agree with any of the  
6 Schlafly brothers to delegitimize the majority  
7 directors and harm the reputations and standing  
8 within Eagle Forum in their respective politically  
9 conservative and religious communities?

10 MR. ELSTER: Same objections.

11 THE DEPONENT: I don't understand the  
12 question.

13 BY MR. SOLVERUD

14 Q. So you can't answer that question the way  
15 it's framed?

16 A. Yeah. When you say did I agree with the  
17 Schlafly brothers, and then you go a long list -- I  
18 tried to have it read back to understand the pieces  
19 of it. I just don't understand what you're asking.

20 Q. Did you ever agree with any of the  
21 Schlafly brothers to actively try to prevent my  
22 clients from fulfilling and exercising their  
23 fiduciary duties to Eagle Forum?

24 MR. ELSTER: Objection to form.

Edward Martin, Jr.

June 4, 2019

Page 267

1 THE DEPONENT: No, sir.

2 BY MR. SOLVERUD

3 Q. Did you ever agree with the Schlafly  
4 brothers to actively attempt to prevent my clients  
5 from or to expose them to liability as directors and  
6 officers of Eagle Forum?

7 MR. ELSTER: Objection. Form, and  
8 legal conclusion.

9 THE DEPONENT: Again, I don't know  
10 what "agree with the Schlafly brothers," what you're  
11 getting at there. So if there's something to look  
12 at, to refresh a discussion or something about those  
13 specifics, I'm happy to look at it, but I don't  
14 recall that at all. That sounds -- what we were  
15 looking to do was -- what I was looking to do was  
16 get the voice Phyllis wanted heard for the Trump  
17 agenda out there.

18 BY MR. SOLVERUD

19 Q. Did you ever agree with any of the  
20 Schlafly brothers to attempt to, quote, "break" my  
21 clients and prevent them from operating Eagle Forum  
22 and accomplishing its mission?

23 A. I don't think so, no.

24 Q. And did you ever agree with any of the

Edward Martin, Jr.

June 4, 2019

Page 268

1 Schlafly brothers to attack the operations of Eagle  
2 Forum?

3 **A. Agree with the Schlafly brothers? Again,**  
4 **I don't know what that means, but I don't think we**  
5 **agreed to attack anybody.**

6 **Q. Did you and any of the Schlafly brothers**  
7 **ever agree to engage in litigation over the assets**  
8 **of Eagle Forum to drag it on for years and prevent**  
9 **Eagle Forum from accomplishing its mission?**

10 **A. That's not something I would have agreed**  
11 **to.**

12 **Q. Why not?**

13 **A. Because it's terrible.**

14 **(Plaintiff's Exhibit 90 was marked for**  
15 **identification.)**

16 **BY MR. SOLVERUD**

17 **Q. You've got a document in front of you**  
18 **marked Exhibit 90, correct?**

19 **A. Mm-hmm.**

20 **Q. And this is an email exchange between you**  
21 **and the rest of the Schlafly brothers except for**  
22 **Roger, correct?**

23 **A. Is this a new one you just gave me? I**  
24 **mean, we've just got it here. Let me read it. Or**

Edward Martin, Jr.

June 4, 2019

Page 269

1 **did you have it before?**

2 MR. ELSTER: Yeah, part of it, but  
3 take a look at it.

4 THE DEPONENT: Oh, yeah. There's the  
5 three-pronged.

6 BY MR. SOLVERUD

7 Q. Tell me when you're done with it.

8 A. Mm-hmm. Okay.

9 Q. On April 11, 2016, at approximately  
10 11:09 p.m., after he had proposed this three-pronged  
11 approach we talked about earlier, Andy sent you  
12 another email, correct?

13 A. Andy sent another email to a -- yes, to  
14 three of us, I think.

15 Q. Well, it's to you, and it's copied to  
16 Bruce Schlafly and John Schlafly, correct?

17 A. Well, it's a reply. These are replies on  
18 the exchanges. So, okay, it says, "to," but it's  
19 the three -- it's four people on the exchanges.

20 Q. Right. And he suggested that "Steve Clark  
21 initiate litigation in Clayton to maintain the  
22 status quo," correct?

23 A. He writes that. Is that what you're  
24 saying?

Edward Martin, Jr.

June 4, 2019

Page 270

1 Q. Yes.

2 A. You're reading it to me? Yes, I see that  
3 written there, yep.

4 Q. Who was Steve Clark?

5 A. An attorney.

6 Q. And who engaged Steve Clark?

7 A. I did as the president of Eagle Forum c4.

8 Q. Did you obtain board approval to engage  
9 counsel on behalf of Eagle Forum?

10 A. It's the president's duties, and  
11 especially since Phyllis, as chairman, wanted us to  
12 do that, did it herself, so.

13 Q. So, "no"?

14 A. Under my -- no, it wasn't.

15 Q. And did you disclose to the other members  
16 of the board that you were engaging Steve Clark to  
17 represent Eagle Forum?

18 A. I -- it was, as I said earlier, Phyllis  
19 was the chairman, and was -- that was her -- that  
20 was not part of what I would do. That would be  
21 Phyllis doing that.

22 Q. And who initiated contact with Steve  
23 Clark?

24 A. I think it was through me, but I can't be



Edward Martin, Jr.

June 4, 2019

Page 271

1     **sure. I think --**

2             Q.     I'm sorry.

3             **A.     Okay. No.**

4             Q.     Are you done?

5             **A.     Yeah.**

6             Q.     And how did you know Steve Clark?

7             **A.     I think through -- that's a good question.**

8     **Either pro-life litigation or the Federalist**  
9     **Society.**

10            Q.     Okay. And Andy Schlafly writes to you  
11     that "If he wins" -- referring to Steve  
12     Clark -- "the first round, we stick with Eagle Forum  
13     as our c4. If he loses the first round, then we  
14     immediately launch Phyllis Schlafly Forum in time to  
15     retain our best state leaders, to defeat Con-Con, to  
16     be ready for the convention and have another  
17     fabulous Eagle Council in September." Did I read  
18     that correctly?

19            **A.     Yes.**

20            Q.     And the best state leaders, who were they?

21                   MR. ELSTER: Objection. Speculation.  
22     BY MR. SOLVERUD

23            Q.     Let me -- who did you understand the best  
24     state leaders to refer to?

Edward Martin, Jr.

June 4, 2019

Page 272

1           **A.     That's --**

2                   MR. ELSTER:   Same objection.

3                   THE DEPONENT:   That's easy.   Whoever  
4   Phyllis told me were the best state leaders.

5   BY MR. SOLVERUD

6           Q.     So you didn't have an understanding?

7           **A.     I did have an understanding.**

8           Q.     Okay.   So --

9           **A.     My understanding was who Phyllis said was**  
10   **the best state leaders.   That's how you'd find that**  
11   **out.**

12          Q.     Who were they?

13          **A.     I would have had to ask her.**

14          Q.     Did you ever?

15          **A.     I don't recall saying it that way, but she**  
16   **would be the one that would describe who was -- you**  
17   **know, who were her best state leaders.**

18          Q.     And did she ever tell you who they were?

19          **A.     Well, I don't think there was a list made,**  
20   **but she talked about good leaders, and so I don't**  
21   **know.   I'm not sure I know how to remember that.**

22          Q.     One of the goals for this new Phyllis  
23   Schlafly Forum entity would be to defeat Con-Con  
24   according to Andy Schlafly; is that right?

Edward Martin, Jr.

June 4, 2019

Page 273

1           **A.     According to Andy's email, sure.**

2           Q.     The Con-Con is something that Eagle Forum  
3 was working on, correct?

4           **A.     Something that Phyllis was working on for**  
5 **decades, yes.**

6           Q.     It's something Eagle Forum was working on,  
7 too, correct?

8           **A.     Yeah, I think that's fair to say, and also**  
9 **Eagle Forum Education and Legal Defense Fund. So**  
10 **everybody was on that one.**

11          Q.     And also the various state Eagle Forum  
12 entities?

13          **A.     Not all of them.**

14          Q.     But most of them?

15          **A.     Not most of them.**

16          Q.     Okay.

17          **A.     Some of them.**

18          Q.     Some of them? Can we agree that --

19          **A.     I think that that issue is a funny one,**  
20 **but, yes, some of them.**

21          Q.     And Eagle Forum was the only entity that  
22 had quote, unquote "state leaders," correct?

23          **A.     Well, as I described earlier, by this**  
24 **time, if you looked on the documents you gave me,**

Edward Martin, Jr.

June 4, 2019

Page 274

1 there was in the handbook, they were called "clubs."  
2 In the bylaws they were called "chapters." By my  
3 time, Phyllis had leaders, and they were -- some of  
4 them were, I think, formerly working as -- in Eagle  
5 Forum c4. Others were sort of independent. So it  
6 was a little bit looser than that quick, but, you  
7 know, then not easy, but . . .

8 Q. Who were the independent leaders?

9 A. Well, people that didn't have an  
10 organization that they set up, didn't formerly  
11 attach on -- with, you know, with one of the  
12 organizations, a c4 or otherwise.

13 Q. What were their names?

14 A. Oh, I don't know. You'd have to go back  
15 and look at the lists.

16 Q. As you sit here today, can you identify  
17 any of the independent leaders that you're referring  
18 to?

19 A. Well, some of the -- this would be, again,  
20 Phyllis -- it's the issue leaders. They were not  
21 state leaders. They didn't run chapter. Just was a  
22 little bit less formal than perhaps it had been  
23 earlier.

24 Q. And the issue leaders, were they part of

Edward Martin, Jr.

June 4, 2019

Page 275

1 Eagle Forum or Eagle Forum Education and Legal  
2 Defense Fund?

3 **A. It wasn't as clear. That's my point.**

4 Q. And, well, did any -- did -- were the  
5 issue leaders, that group of people, were they part  
6 of EFELDF?

7 **A. They were independent. That's my point.**  
8 **They were not -- they were in Phyllis Schlafly's**  
9 **Eagles. They were not -- they didn't go through the**  
10 **process of becoming club -- forming a club, forming**  
11 **a chapter. So it was a little bit different.**  
12 **That's exactly my point.**

13 Q. What did you do in response to Andy's  
14 email?

15 **A. Well, the timing of this is -- you can see**  
16 **it is late at night, and Phyllis is really upset at**  
17 **what's gone on. There's a lot of concern on what to**  
18 **do. And so I think this is Andy, you know, having**  
19 **ideas. Andy is an idea guy. So this was a bunch of**  
20 **ideas. I don't see a lot of it that was what we**  
21 **did, but it was a tough time. Phyllis was really**  
22 **upset, and so there was a lot of concern.**

23 Q. So what did you do in response to Andy's  
24 email?

Edward Martin, Jr.

June 4, 2019

Page 276

1           A.    I don't recall doing anything at 11:09 in  
2    response to that. I don't recall that. I think by  
3    then -- I'd have to look at time -- we already had  
4    Steve Clark advising us. So I'm not sure  
5    what -- you know, there were other aspects of our  
6    work that Phyllis was hoping could solve the  
7    problems, and that included her talking to her board  
8    members of the c4, and her asking them what they  
9    wanted and things like that. So this advice, it  
10   doesn't strike me that we did anything with it.

11           Q.    There's no mention of the Trump agenda on  
12   Andy Schlafly's email, correct?

13           A.    No, I don't see that, but . . .

14           Q.    There's no mention of Donald Trump at all  
15   in Andy's email, correct?

16           A.    I don't see that in here, no.

17           Q.    Did you ever tell Andy Schlafly that it  
18   would be inappropriate for you as the president of  
19   Eagle Forum to create or launch another entity to  
20   retain the best state leaders to defeat Con-Con, to  
21   be ready for the convention and to have another  
22   fabulous Eagle Council in September?

23                   MR. ELSTER: Objection. Compound,  
24   form, vague.

Edward Martin, Jr.

June 4, 2019

Page 277

1 THE DEPONENT: I don't recall having  
2 conversations with Andy about any of this that he  
3 sort of proposed or spit-balled. I don't recall  
4 that. So I don't know.

5 BY MR. SOLVERUD

6 Q. Do you believe it would have been  
7 appropriate for you to participate in launching of  
8 another entity called "Phyllis Schlafly Forum" on  
9 April 11, 2016 to retain the best state leaders to  
10 defeat Con-Con, to be ready for the convention, and  
11 to have another fabulous Eagle Council in September?

12 MR. ELSTER: Objection. Vague as to  
13 appropriate.

14 THE DEPONENT: It's not -- his ideas  
15 are not what I would choose or did choose to be  
16 going forward. So I don't -- you could talk to Andy  
17 about what he meant by it. I don't know what he  
18 meant by it, so I wouldn't be able to give you a  
19 real judgment on that.

20 BY MR. SOLVERUD

21 Q. Do you believe it would have been in the  
22 best interests of Eagle Forum in April -- on  
23 April 11, 2016 to launch another entity called  
24 "Phyllis Schlafly Forum" to retain the best state

Edward Martin, Jr.

June 4, 2019

Page 278

1 leaders, to defeat Con-Con, to be ready for the  
2 convention, and to have another fabulous Eagle  
3 Council in September?

4 THE DEPONENT: Well, we didn't do  
5 that. So, you know, again, you're asking me my  
6 response to this? You'd have to ask Andy what he  
7 meant. That's not a name we used. It's not  
8 something that was a priority.

9 Again, we were -- we were in the  
10 midst of Phyllis concerned, and we were -- I think  
11 you see, feeling our way. Andy was feeling his way  
12 with three-point plans and others, you know. The  
13 rest of us were trying to figure out how -- what was  
14 happening.

15 BY MR. SOLVERUD

16 Q. Well, you did do some of this, didn't you?

17 A. I'm not sure what that means.

18 Q. Well, you launched another entity,  
19 correct?

20 A. Well, not on April 11th and not under  
21 any of those names or any of those circumstances, I  
22 don't think.

23 Q. You launched another entity in May,  
24 correct?



Edward Martin, Jr.

June 4, 2019

Page 279

1           **A.     Yes.**

2           Q.     And instead of calling it "Phyllis  
3     Schlafly's Forum," you called it "Phyllis Schlafly's  
4     American Eagles," correct?

5           **A.     Well, we started a c4 in May called**  
6     **"Phyllis Schlafly's American Eagles," yes.**

7           Q.     And through Phyllis Schlafly's American  
8     Eagles, you tried to retain the best state leaders,  
9     correct?

10          **A.     I think we -- by then, there was a**  
11     **lawsuit, right? So there was a lawsuit by some of**  
12     **the board members against Phyllis and John and I.**

13                 So what we were doing was saying how do we  
14     make Phyllis' voice heard and our voice heard on the  
15     Trump agenda, and we thought some people wanted to  
16     be part of that voice, and that's what we did. Some  
17     people didn't believe in Trump's agenda, how it was  
18     fitting, and didn't want to be there. So that was  
19     the reason to start.

20          Q.     So the answer to my question is "yes"?

21          **A.     No. That was my answer to your question.**

22          Q.     Well, sir, isn't it true that you started  
23     Phyllis Schlafly's American Eagles in May, and one  
24     of the things you tried to do through Phyllis

Edward Martin, Jr.

June 4, 2019

Page 280

1 Schlafly's American Eagles was retain the best state  
2 leaders?

3 **A. No.**

4 Q. No? Okay. And isn't it true that one of  
5 the -- another thing you tried to do through Phyllis  
6 Schlafly's American Eagles was defeat Con-Con?

7 **A. Well, of course. That's right.**

8 Q. Okay. And another thing that you tried to  
9 do through Phyllis Schlafly's American Eagles was  
10 get ready for the convention; isn't that right?

11 **A. Well, that's -- you misspoke earlier.**  
12 **That's about the -- that's about the -- headed**  
13 **towards the Trump agenda when you said that there**  
14 **wasn't mention on here, but that was a -- I'm not**  
15 **sure that was a Phyllis Schlafly's American Eagles,**  
16 **what we ended up doing in the c4. See, again, this**  
17 **is Andy's comments on what he wanted to do.**

18 Q. I'm not talking about Andy's comments.  
19 You can put that down.

20 **A. You just brought up Andy's comments.**

21 Q. You can put that down, and I'm asking you  
22 a question independent of Andy's comments.

23 **A. Okay.**

24 Q. Isn't one of the other things that you

Edward Martin, Jr.

June 4, 2019

Page 281

1     tried to do through Phyllis Schlafly's American  
2     Eagles was get ready for the convention?

3             **A.     No.**

4             Q.     No?

5                     And is another thing that you tried to do  
6     through Phyllis Schlafly's American Eagles was to  
7     have another fabulous Eagle Council in September of  
8     2016?

9             **A.     We had an Eagle Council scheduled long**  
10    **before any of the -- we would have one anyway. So**  
11    **that was a function of what the job we did. You can**  
12    **see earlier in the email -- I know you're not**  
13    **referring to it -- we already lined up somebody to**  
14    **speak.**

15            Q.     And you did some of that through Phyllis  
16     Schlafly's American Eagles, correct?

17            **A.     That's -- EFELDF is really -- Eagle**  
18    **Council is how we did it. That's how we considered**  
19    **it, but mostly -- Phyllis was alive, so Phyllis was**  
20    **the one who handled it.**

21            Q.     Well, does Phyllis Schlafly's American  
22     Eagles play any role in Eagle Council?

23            **A.     I don't recall that. I'm not sure.**

24            Q.     Did you ever tell Andy Schlafly that you

Edward Martin, Jr.

June 4, 2019

Page 282

1 couldn't participate in his plan reflected on  
2 Exhibit 90?

3 **A. Which one?**

4 Q. Either one of the plans reflected on  
5 Exhibit 90.

6 **A. It looks like there's multiple ones. So I**  
7 **don't know that -- I don't know what my**  
8 **conversations with Andy would have been, but I don't**  
9 **know. I don't recall those conversations.**

10 (Plaintiff's Exhibit 91 was marked for  
11 identification.)

12 **BY MR. SOLVERUD**

13 Q. I'm going to hand you a document marked  
14 Exhibit 91. I just put that sticker right over the  
15 top of that one.

16 **A. Okay.**

17 Q. And can you identify Exhibit 91 as  
18 beginning with an email exchange between you and  
19 Bill Wilson on April 11th of 2016?

20 **A. I see it, yes.**

21 Q. Okay. And Bill Wilson is forwarding to  
22 you suggestions from Jim Crumley, who was a  
23 former -- well, not a former. Who was providing  
24 services to Eagle Forum at the time, correct?

Edward Martin, Jr.

June 4, 2019

Page 283

1           **A.     I'm sorry. The question was what?**

2           Q.     I'll -- are you done looking at it?

3           **A.     Yeah, yes. I'm done looking at it.**

4           Q.     Bill Wilson is forwarding to you an email  
5 with suggestions from Jim Crumley, correct?

6           **A.     Bill Wilson is forwarding -- yes, whatever**  
7 **suggestions or questions or comments, yes.**

8           Q.     Okay. From Jim Crumley?

9           **A.     From Jim Crumley, yes, sir.**

10          Q.     And you knew who Jim Crumley was at the  
11 time?

12          **A.     Yes, sir.**

13          Q.     Jim Crumley was somebody who had already  
14 been providing services to Eagle Forum at the time  
15 that he sent this email to Bill Wilson on April 11,  
16 2016, correct?

17          **A.     Bill -- Jim Crumley is the writer, the**  
18 **letter writer. So he's a -- he's a consultant or**  
19 **someone we use with episodically or periodically,**  
20 **whichever word is better.**

21          Q.     He had done that for you prior to  
22 April 11, 2016?

23          **A.     Correct.**

24          Q.     Did you review Jim Crumley's email?

Edward Martin, Jr.

June 4, 2019

Page 284

1           A.    I don't recall seeing this at the time.  
2   I've seen it since.

3           Q.    Do you agree with Jim Crumley's comments?

4           A.    I don't agree with Jim Crumley's  
5   characterization of people. I think that's rude,  
6   and I'm disappointed in that. And I think his  
7   advice, some of his advice -- again, I've only  
8   reviewed this more recently -- is silly and  
9   dramatic. So I'm not sure that that --  
10   whether -- what I thought at the time. I don't  
11   think I read it, to be honest, at the time. It's  
12   further down, but it's -- go ahead.

13          Q.    On April 11, 2016, you state, "The  
14   trademark for Eagle Forum is owned by the c4,"  
15   correct?

16          A.    I wrote that, yes.

17          Q.    Okay. That was your understanding on  
18   April 11, 2016?

19          A.    I had been made aware of that at that  
20   time, yes.

21          Q.    By whom?

22          A.    Phyllis.

23          Q.    Okay. You state, "I have been arguing  
24   internally for six months for a shift to Phyllis

Edward Martin, Jr.

June 4, 2019

Page 285

1 Schlafly Forum anyway." Can you explain what you  
2 mean by that?

3 A. Well, when I started working with Phyllis,  
4 one of the conversations she had was about the  
5 future, and one of the things that she knew was her  
6 name was so valuable. And so my assessment of that  
7 was that the Eagle names might not be as valuable as  
8 her name longterm. I was -- it was more of a  
9 instinct than it was a research, but I had been  
10 looking. Dave Horowitz's organization had a name  
11 change, but she didn't -- she did not agree with  
12 that. That was not something that she at that time  
13 thought was a good idea.

14 Q. So at least as early as the middle of  
15 2015, one of the things that you as -- in your  
16 capacity acting as president of Eagle Forum were  
17 considering was a name change from "Eagle Forum" to  
18 "Phyllis Schlafly Forum," correct?

19 A. No. That's a little bit dramatic.

20 Q. That's what you said.

21 A. No, that's not what I said. Read it back.

22 Q. I've been arguing --

23 A. You characterized it as something else.

24 Q. So who -- let me ask you a different

Edward Martin, Jr.

June 4, 2019

Page 286

1 question then, Ed. Who were you arguing with?

2 A. I think the discussion was probably  
3 Phyllis and John and others, board members, people,  
4 that what is it -- how do you make that the most  
5 effective.

6 Remember, I was aware -- well, I'll just  
7 tell you. Not remember. I was aware of the power  
8 of Phyllis' person and history, and I thought that  
9 was so important. We had seen, you know, Trump and  
10 the whole presidential election swing, when she  
11 commented on Trump in December of 2015. So I think  
12 that was a discussion about how -- also, Phyllis and  
13 I had been trying to figure out how to attract  
14 people to the organization. That was a conversation  
15 we often have, so, but it was not something that we  
16 were doing.

17 Q. So you were arguing with Phyllis and John  
18 about it, correct?

19 A. It's a bit dramatic, arguing.

20 Q. That's your word.

21 A. I know it's a bit dramatic in an email. I  
22 think the conversation was how do you make the more  
23 people drawn to what Phyllis has accomplished.

24 Q. Let me just ask this as clearly as



Edward Martin, Jr.

June 4, 2019

Page 287

1 possible.

2 **A. Uh-huh.**

3 Q. Were you arguing with people, or were you  
4 not arguing with people?

5 **A. Well, let me answer it as dramatically as**  
6 **I can.**

7 MR. ELSTER: Ed, stop. Just answer  
8 his question.

9 THE DEPONENT: When I write this,  
10 when I write this down, I'm saying that we were  
11 having discussions about the importance. So I'm not  
12 sure it was arguing, but it's a way to convey that  
13 we were -- that I was discussing it, and I don't  
14 think it was something that Phyllis -- that she was  
15 very reticent to use her name too much like that,  
16 so.

17 BY MR. SOLVERUD

18 Q. And you said that you were arguing  
19 with -- I think the people you gave me were Phyllis,  
20 John, and then you said, "other board members."  
21 What other board members were part of that?

22 **A. I don't recall at that time. I mean, I**  
23 **don't recall who would have been -- who I would have**  
24 **been talking to about it.**

Edward Martin, Jr.

June 4, 2019

Page 288

1 Q. And your position that you felt strongly  
2 about is that Eagle Forum should be renamed "Phyllis  
3 Schlafly Forum," correct?

4 A. I don't recall that too well. I think my  
5 point was Phyllis Schlafly's name was so valuable,  
6 that it was -- that was the discussion we were  
7 having about how to help her attract more people to  
8 what she had done and written, but that was --

9 Q. And that was something that you were  
10 discussing with Phyllis, John, and other board  
11 members of Eagle Forum, correct?

12 A. No. I think I said I don't recall who I  
13 was talking to about it, but it would have been  
14 something -- and it wasn't a big thing, but it was  
15 something that the question was how to maximize what  
16 Phyllis was trying to do.

17 Q. And one of the ways that you felt to  
18 maximize what Phyllis was trying to do with Eagle  
19 Forum was to shift the name to "Phyllis Schlafly  
20 Forum," correct?

21 A. I don't -- I'm not sure I thought that. I  
22 think I talked about that name change, but I'm not  
23 sure I knew that, but it was a discussion. It was  
24 something we talked about.

Edward Martin, Jr.

June 4, 2019

Page 289

1 Q. And you were talking about it with  
2 Phyllis, John, and other board members, right?

3 A. I think I told you again I'm not sure who  
4 I talked to about it.

5 Q. Okay.

6 A. I think -- I don't know who it was. I  
7 mean, it would have been something -- it wasn't a  
8 big thing, but it would have been something we  
9 were -- I remember talking about it. Again, I don't  
10 know.

11 Q. It was important enough that you were  
12 doing research, and in David Horowitz, and  
13 conducting your own sort of evaluation, correct?

14 A. No.

15 MR. ELSTER: Objection.  
16 Mischaracterizes his testimony. I don't think he  
17 said there was research, but --

18 THE DEPONENT: Yeah -- no. The  
19 answer is "no."

20 (Plaintiff's Exhibit 92 was marked for  
21 identification.)

22 BY MR. SOLVERUD

23 Q. Okay. Let me show you a document marked  
24 Exhibit 92.

Edward Martin, Jr.

June 4, 2019

Page 290

1           **A.     Okay.**

2           Q.     So this is an email exchange between you  
3     and Bill Wilson, correct?

4           **A.     Yes, sir.**

5           Q.     And Bill Wilson was one of the political  
6     consultants that you were consulting with about the  
7     creation of Phyllis Schlafly's American Eagles,  
8     correct?

9           **A.     At this time? Yes, I think -- well, I'm**  
10    **not sure at this time, but we did consult with him**  
11    **about many things.**

12          Q.     And he provided some additional  
13    suggestions from Jim Crumley, correct?

14          **A.     Yes, sir.**

15          Q.     And he also said, "I'm around if you want  
16    to plot," correct?

17          **A.     Yes, sir.**

18          Q.     And did you talk to Bill Wilson to plot?

19          **A.     I don't recall that, no.**

20          Q.     What -- do you recall you and Bill Wilson  
21    plotting anything?

22          **A.     I don't recall that kind of word. That's**  
23    **not how I would have talked about it, but I don't**  
24    **know what he meant.**

Edward Martin, Jr.

June 4, 2019

Page 291

1 Q. Jim Crumley, his recommendation or  
2 suggestion to you, number 1, "was smear the living  
3 shit out of everyone involved and fast," correct?

4 A. That's what it says, yes.

5 Q. And that's something that you tried to do,  
6 correct?

7 A. No, sir.

8 Q. And he says, "Make sure the world  
9 understands they're trying to steal donor money,"  
10 correct?

11 A. He writes that, yes.

12 Q. And that's something you tried to do,  
13 correct?

14 A. No, sir.

15 Q. He says, "Keep pounding on how this is all  
16 illegal. The muted phone call is huge. The entire  
17 world must understand it," correct?

18 A. There's what it says.

19 Q. And that's something you did was keep  
20 pounding on how this was all illegal?

21 A. No, I don't think so.

22 Q. He says, number 3, "get everything  
23 important out of the office she legally can." You  
24 did that, correct?

Edward Martin, Jr.

June 4, 2019

Page 292

1           **A.    No, sir.**

2           Q.    He says, "Make sure all the c4 donors are  
3 on her side." You tried to do that, didn't you?

4           **A.    No, sir.**

5           Q.    And then "Make sure everyone understands  
6 the c4 will be evicted and billed for services by  
7 the c3 if this shit stands." Did I read that  
8 correctly?

9           **A.    Yes, sir.**

10          Q.    And you tried to do that not through the  
11 c3, but through Eagle Trust Fund, correct?

12          **A.    No, sir.**

13          Q.    You prevented them from having access to  
14 the office in Washington, D.C., correct?

15          **A.    No, sir.**

16          Q.    You prevented them from having access to  
17 their offices in Alton, correct?

18          **A.    No, sir.**

19          Q.    He says in number 5, "Attack the liberal  
20 greedy rump board with reckless abandon. The chick  
21 from Texas mishandled state party funds. Use that."  
22 Did I read that correctly?

23          **A.    You did.**

24          Q.    You did?

Edward Martin, Jr.

June 4, 2019

Page 293

1           **A.    No, sir.**

2           Q.    And number 6.  It says, "Continue  
3   operating the c4 as normal until or unless she's  
4   kicked out by a judge."  You did that, didn't you?

5           **A.    No, sir.**

6           Q.    And number 7 is -- says, "If at all  
7   humanly possible, screw the crap out of the board  
8   members personally."  You did that?

9           **A.    No, sir.**

10          Q.    And it says, "She must destroy these board  
11   members, or else it will either come back to her  
12   again, or someone else will try this shit."  You  
13   tried to destroy the board members, didn't you?

14          **A.    No, sir.**

15          Q.    And you say -- he says, "Make them feel  
16   personal and public pain now."  Did I read that  
17   correctly?

18          **A.    Yes, sir.**

19          Q.    And you tried that, didn't you?

20          **A.    No, sir.**

21          Q.    Did you ever get any money from Jim  
22   Crumley or Bill Wilson?

23          **A.    Did I ever get any money?**

24          Q.    Mm-hmm.

Edward Martin, Jr.

June 4, 2019

Page 294

1           **A.     No.**

2           Q.     Okay.   Because Jim Crumley says he'll give  
3     you money for a private investigator.   Do you see  
4     that?

5           **A.     No.   I didn't see that, no.**

6           Q.     At the very bottom on number 8.

7           **A.     Yeah.   No.**

8                   **(Plaintiff's Exhibit 93 was marked for**  
9     **identification.)**

10          **BY MR. SOLVERUD**

11          Q.     Let me show you a document marked  
12     Exhibit 93.

13          **A.     There must have been two of the same**  
14     **thing.**

15                   MR. ELSTER:   I've got one.

16                   MR. SOLVERUD:   Who wants one?

17          **BY MR. SOLVERUD**

18          Q.     Exhibit 93 are email exchange between you  
19     and Bill Wilson, correct?

20          **A.     I'm looking at it.   Okay.**

21          Q.     And Exhibit 93 is you telling Bill Wilson  
22     that you want to move forward with his Citizen  
23     Empowerment League as Phyllis Schlafly American  
24     Eagles, correct?



Edward Martin, Jr.

June 4, 2019

Page 295

1           **A.     I don't see that on here. Did I miss it?**

2           Q.     Well, there's a reference to the c4 move,  
3 correct?

4           **A.     I'm not sure what you're saying.**

5           Q.     Okay. On April 21, 2016 at 3:47, Bill  
6 Wilson writes, "Okay. So we can move on the c4 the  
7 second you send me the new board of directors and  
8 the preferred name."

9           **A.     Uh-huh.**

10          Q.     That's the new c4 -- or strike that.

11                 The c4 that you can move on is Citizen  
12 Empowerment League and giving the new name, which  
13 became "Phyllis Schlafly's American Eagles,"  
14 correct?

15          **A.     I think that's what he's referring to. I**  
16 **don't recall this, the timing of this, but I think**  
17 **that's what he's referring to, yes.**

18          Q.     And on Thursday, April 21, 2016 at 3:39,  
19 you say to Bill Wilson, "Phyllis wants to do c4  
20 move." Do you see that?

21          **A.     Uh-huh.**

22          Q.     And that's a reference to Citizen  
23 Empowerment League becoming Phyllis Schlafly's  
24 American Eagles, correct?

Edward Martin, Jr.

June 4, 2019

Page 296

1           **A. I can't be sure of the timing, but it**  
2           **sounds like it, that we're talking about that**  
3           **creation of that new entity.**

4           Q. On April 21, 2016, you were still acting  
5           as president of the Eagle Forum, correct?

6           **A. Yes.**

7           Q. And on April 21, 2016, Phyllis Schlafly  
8           was still director of Eagle Forum, correct?

9           **A. I believe so, chairman. Wasn't she**  
10          **chairman? But as the director.**

11          Q. And on April 21, 2016, all of the board  
12          members that eventually became board members of  
13          Phyllis Schlafly's American Eagles were still board  
14          members of Eagle Forum, correct?

15          **A. I don't know that, to know the timing.**

16          Q. On April 21, 2016, did you -- or are you  
17          aware of any disclosure to the Eagle Forum board of  
18          directors of a decision to create a new c4 entity?

19          **A. Phyllis would have been well aware of**  
20          **that.**

21          Q. And are you aware of any disclosure to the  
22          entire board of directors of Eagle Forum of a  
23          decision to do a c4 move?

24          **A. No, sir.**

Edward Martin, Jr.

June 4, 2019

Page 297

1 Q. And he tells you that "We will move on all  
2 of that tomorrow," correct?

3 A. That's what his email says, yes.

4 Q. And you say, "Okay. Can I call you in ten  
5 minutes," right?

6 A. That's what I write, yes.

7 Q. And what did you discuss with him?

8 A. I don't know. I don't recall that  
9 conversation.

10 MR. SOLVERUD: This is a  
11 document -- I think it's 9.

12 MR. ELSTER: Okay.

13 BY MR. SOLVERUD

14 Q. Do you want to . . .

15 I hand you a document -- let's -- let me  
16 mark that just --

17 A. Okay.

18 (Exhibit 9, previously marked, was  
19 identified for the record.)

20 BY MR. SOLVERUD

21 Q. This is a document that's formerly been  
22 marked as PSAE 9. Can you identify what Exhibit 9  
23 is?

24 A. Okay.

Edward Martin, Jr.

June 4, 2019

Page 298

1 Q. Exhibit 9 are a series of documents  
2 associated with the creation of Phyllis Schlafly's  
3 American Eagles on or about May 11, 2016, correct?

4 A. Yes.

5 Q. And I've used the word "creation."

6 A. Yes. I was going to --

7 Q. But your understanding was the renaming  
8 of --

9 A. Right. Existing organization, yes.

10 Q. Okay. You understood that Phyllis  
11 Schlafly's American Eagle is a non-stock  
12 organization organized under Virginia law, correct?

13 A. I guess I'd have to make sure to read  
14 that. If you say that's the language of it. I  
15 think I know that to be so. I'm not -- it's a  
16 bit -- it's a bit muddled right now, but I think  
17 that's right.

18 Q. And all the filings that were made were  
19 made in Virginia, because it was a Virginia  
20 corporation, true?

21 A. That's true.

22 Q. PSAE, or Phyllis Schlafly's American  
23 Eagles, is a 501(c)(4) like Eagle Forum, correct?

24 A. Like Eagle Forum, yes, sir.

Edward Martin, Jr.

June 4, 2019

Page 299

1 Q. And I think I asked you this already, but  
2 I want to be clear. Are you aware of any employees  
3 that have ever been employed by Phyllis Schlafly's  
4 American Eagles?

5 A. I'm not aware of any --

6 Q. Okay.

7 A. -- as far as I can recall.

8 Q. PSAE was originally incorporated on  
9 April 16, 2015 under the names of this --

10 A. Yep.

11 Q. And what you've got in Exhibit 9 includes  
12 the certificate of incorporation and the articles of  
13 incorporation, correct?

14 A. Yes, sir.

15 Q. On May 11, 2016, articles of amendment  
16 were filed on an expedited basis, same-day service,  
17 with the Virginia State Corporation on your behalf,  
18 correct?

19 A. Yes.

20 Q. And Ray Wotring did that for you, correct?

21 A. I believe that's right, yes, sir.

22 Q. And if you look at that page --

23 A. Okay.

24 Q. You're identified as the customer contact

Edward Martin, Jr.

June 4, 2019

Page 300

1 information for Phyllis Schlafly's American Eagles,  
2 correct?

3 **A. Yes.**

4 Q. Okay. And it shows it was -- you paid  
5 \$200 in order to do an expedited business entity  
6 document?

7 **A. Yes.**

8 Q. Why?

9 **A. I don't recall the specific reason.**

10 Q. If you turn two pages in to the articles  
11 of amendment. Do you see that?

12 **A. Yes, sir.**

13 Q. Is that your signature on the article of  
14 amendment?

15 **A. Yes, sir.**

16 Q. And so under the articles of amendment, it  
17 shows changing the name of Citizen Empowerment  
18 League to Phyllis Schlafly's American Eagle,  
19 correct?

20 **A. American Eagles, yes.**

21 Q. Yes. And it says the amendment was  
22 adopted on May 9, 2016, correct?

23 **A. Yes, sir. Yes.**

24 Q. It says it was a vote of at least

Edward Martin, Jr.

June 4, 2019

Page 301

1 two-thirds of the directors in office?

2 **A. Yes.**

3 Q. Who were the directors in office that  
4 voted?

5 **A. I can't be sure, but those officers**  
6 **existed, the ones on the other page. I'm not sure**  
7 **which of those.**

8 Q. And are you aware of a vote that took  
9 place?

10 **A. Yes. I'm aware that they -- that the**  
11 **vote -- that we're told, as this document reflects,**  
12 **there was a vote.**

13 Q. Do you have any evidence that there was a  
14 vote?

15 **A. Only that -- the documents I was given and**  
16 **relied on, I think. I guess I could have heard**  
17 **more, but that's what I think I know.**

18 Q. According to this document, there are no  
19 members for PSAE; is that right?

20 **A. That's what it says, yes.**

21 Q. Is that a true statement?

22 **A. That's what it says here, yes.**

23 Q. Have there ever been any members of PSAE?

24 **A. I guess not in that term, legal term. So**

Edward Martin, Jr.

June 4, 2019

Page 302

1 I think probably not.

2 Q. And is that your signature?

3 A. Yes, sir.

4 Q. If you turn to the next page, it's the  
5 2016 annual report.

6 A. Mm-hmm.

7 Q. It identifies the principal office address  
8 of PSAE as 322 State Street, correct?

9 A. Yes, sir.

10 Q. Wasn't that also the principal office  
11 address of Eagle Forum?

12 A. No, sir.

13 Q. Has 322 State Street ever been the  
14 principal office address of Eagle Forum?

15 A. My understanding it was the P.O. box.  
16 That was the documents you showed me earlier. It  
17 was the P.O. box.

18 Q. Okay.

19 A. So in Alton.

20 Q. The document, the report lists the  
21 directors?

22 A. Mm-hmm.

23 Q. And basically all of the former directors  
24 of Citizen Empowerment League opted out, or I guess



Edward Martin, Jr.

June 4, 2019

Page 303

1 were deleted, for lack of a better word, leaving  
2 only Ray Wotring as an officer on the new entity,  
3 correct?

4 **A. Correct.**

5 Q. The other officers and directors were you  
6 as president, correct?

7 **A. Yes.**

8 Q. And you were the only officer and  
9 director; isn't that right?

10 **A. Yes.**

11 Q. At the time you filed the documents  
12 reflected in Exhibit 9, and including the annual  
13 report, you were still president of the Eagle Forum,  
14 correct?

15 **A. Yes.**

16 Q. And you still had an obligation to act in  
17 the best interests of Eagle Forum, correct?

18 MR. ELSTER: Object to form. Legal  
19 conclusion.

20 THE DEPONENT: I was still  
21 present -- president, yes.

22 BY MR. SOLVERUD

23 Q. As president, you understood that your  
24 duty was to act in the best interests of Eagle

Edward Martin, Jr.

June 4, 2019

Page 304

1 Forum, correct?

2 **A. Yes. Yes, sir.**

3 Q. Kathleen Sullivan was a director of Eagle  
4 Forum on May 12, 2016, correct?

5 **A. I take your word for it, yes.**

6 Q. And she became director of Phyllis  
7 Schlafly's American Eagles, correct?

8 **A. Yes, sir. Yep.**

9 Q. And John Schlafly was an officer and  
10 director of Eagle Forum on May 12, 2016, correct?

11 **A. Yes, sir.**

12 Q. And he became a director of Phyllis  
13 Schlafly's American Eagles, correct?

14 **A. Yes.**

15 Q. And Phyllis Schlafly was an officer and  
16 director of Eagle Forum on May 12, 2016, correct?

17 **A. Yes.**

18 Q. And she became a director of Phyllis  
19 Schlafly's American Eagles, correct?

20 **A. Yes.**

21 Q. And all of their -- all of their addresses  
22 are -- except for Ray Wotring are 322 North State  
23 Street, Suite 301; is that right?

24 **A. That's what it reads, yes, sir.**

Edward Martin, Jr.

June 4, 2019

Page 305

1 Q. And why is that the offices for Ed Martin  
2 and Phyllis Schlafly?

3 A. I'm not sure I recall that discussion, but  
4 it probably was something that I talked to Phyllis  
5 or John about, and it seemed like the right thing.  
6 I'm not sure.

7 Q. Well, as of May 12, 2016, Kathleen  
8 Sullivan wasn't keeping an office at 322 State  
9 Street, was she?

10 A. Kathleen Sullivan was not keeping an  
11 office. She was not keeping an office at Alton,  
12 correct.

13 Q. Right. And you never maintained an office  
14 at 322 State Street, correct?

15 A. Correct.

16 Q. And Phyllis Schlafly was no longer keeping  
17 an office at 322 State Street on May 12, 2016,  
18 correct?

19 A. I can't answer that one with confidence.  
20 I think she went -- I think she still was going over  
21 to Alton, but maybe not. I'm not sure what an  
22 office -- you know.

23 Q. She may have gone over there, but she  
24 wasn't maintaining an office, an ongoing presence

Edward Martin, Jr.

June 4, 2019

Page 306

1 there; isn't that right?

2 **A. No, that's not right.**

3 Q. What is right? Is it your testimony that  
4 she kept an ongoing presence at 322 State Street in  
5 May of 2016?

6 **A. Again, I'm not clear exactly the timing of**  
7 **how -- but, yes, I would say until her death, she**  
8 **was -- her presence was there. I don't know how**  
9 **many times she went there, but that was clear it was**  
10 **one of her offices.**

11 Q. Andy Schlafly is listed as a director of  
12 PSAE, correct?

13 **A. Yes, sir.**

14 Q. And he was also a director of Eagle Forum  
15 at the time, correct?

16 **A. On May 12th?**

17 Q. Yes, sir.

18 **A. I think so, yeah.**

19 Q. And Andy Schlafly has never maintained an  
20 office at 322 State Street, has he?

21 **A. Not that I know of.**

22 Q. And with the exception of Phyllis and Ray  
23 Wotring, are all these directors still associated  
24 with PSAE as directors and or officers?

Edward Martin, Jr.

June 4, 2019

Page 307

1           **A.     I believe so, yes.**

2           Q.     Have there been any new directors or  
3 officers added?

4           **A.     Not that I recall.**

5           Q.     And how did you identify the individual to  
6 be directors?

7           **A.     Phyllis expressed to me who she would put  
8 on.**

9           Q.     Is it just coincident that these are the  
10 individuals who are part of the minority directors  
11 of Eagle Forum?

12          **A.     I think -- I'm not sure "coincident" is  
13 the right word. I think Phyllis wanted to make her  
14 voice heard in that -- in that c4 on the Trump  
15 issues, and she needed to start that organization,  
16 so she got people there that she could trust to help  
17 her do that.**

18          Q.     Why wasn't Phyllis Schlafly an officer of  
19 Phyllis Schlafly's American Eagles?

20          **A.     I'm not sure. That strikes me as an  
21 oversight, too, but . . .**

22          Q.     Have you ever known Phyllis Schlafly to  
23 lend her name to an organization that she wasn't  
24 officer of?

Edward Martin, Jr.

June 4, 2019

Page 308

1           **A.     Well, of course, yeah.**

2           **Q.     Okay. And can you identify --**

3           **A.     I don't think RNC for Life, she was an**  
4 **officer to it.**

5           **Q.     I'm talking about an entity with her name**  
6 **on it.**

7           **A.     Oh. Well, I'm not sure -- maybe not then.**  
8 **I'm not sure. I'm not sure I can think of any.**  
9 **Probably not.**

10          **Q.     And RNC for Life doesn't have a board,**  
11 **right?**

12          **A.     It kind of has a board, yeah. I don't**  
13 **know if it's a formal board of directors, but it has**  
14 **a board.**

15          **Q.     Does it have officers?**

16          **A.     Phyllis was an officer in here, wasn't**  
17 **she?**

18          **Q.     I'm talking about RNC for Life.**

19          **A.     I think it has a chairman. I don't**  
20 **know -- you may be right about not having directors.**

21          **Q.     I mean, are you aware of any organization**  
22 **that Phyllis was associated with that she wasn't**  
23 **chairman or president of?**

24          **A.     Probably no other one. It was**

Edward Martin, Jr.

June 4, 2019

Page 309

1 **extraordinary times.**

2 Q. Since the creation of Phyllis Schlafly's  
3 American Eagles in Exhibit 9, have members ever been  
4 recruited to PSAE?

5 **A. I don't think that term would be what we'd**  
6 **use, no.**

7 Q. How did you decide on the name "Phyllis  
8 Schlafly's American Eagles"?

9 **A. I don't recall that.**

10 Q. Who was involved in the naming of Phyllis  
11 Schlafly's American Eagles?

12 **A. I think the people I remember having some**  
13 **interest in that discussion would have been Phyllis**  
14 **and Kathleen and John, but I suspect there was more.**

15 Q. Well, Phyllis Schlafly had argued with you  
16 that she didn't want her name associated with the  
17 Eagle Forum or other organizations?

18 **A. No, sir.**

19 Q. No? That never happened?

20 **A. No, sir.**

21 Q. Is it true that Eagle Forum referred to  
22 itself at times as "Phyllis Schlafly's Eagle Forum";  
23 isn't that right?

24 **A. I think most of our organizations would**

Edward Martin, Jr.

June 4, 2019

Page 310

1 say that about themselves at various times, so, yes.

2 (Plaintiff's Exhibit 10, previously  
3 marked, was identified for the record.)

4 BY MR. SOLVERUD

5 Q. Let me show you a document marked  
6 Exhibit 10.

7 A. Yeah.

8 Q. And that's -- you can identify Exhibit 10  
9 as an incidence where Eagle Forum was referred to as  
10 "Phyllis Schlafly's Eagle Forum," correct?

11 A. That's this piece of paper, yes.

12 Q. And, in fact, that's something you were  
13 advocating to do more and more of as president of  
14 Eagle Forum, correct?

15 A. I, as president of Eagle Forum, and Eagle  
16 Forum Education and Legal Defense Fund believed and  
17 still believe that Phyllis Schlafly's name is iconic  
18 and valuable and important, so, yes.

19 Q. That was part of the strategic plan that  
20 we looked at earlier today was associating it with  
21 Phyllis' name, correct?

22 MR. ELSTER: Objection. Form. As to  
23 "strategic plan."

24 THE DEPONENT: Yeah. I think there



Edward Martin, Jr.

June 4, 2019

Page 311

1 was a draft plan, but I think there was a discussion  
2 in there about that, but, again, that plan wasn't  
3 adopted, so it's a discussion. There certainly is a  
4 discussion about that.

5 BY MR. SOLVERUD

6 Q. You understood that when using the name  
7 "Phyllis Schlafly's American Eagles," there would  
8 be -- people would be confused as to the differences  
9 between Phyllis Schlafly's American Eagles and Eagle  
10 Forum?

11 A. No, sir.

12 MR. ELSTER: Objection to form.

13 THE DEPONENT: No, sir.

14 BY MR. SOLVERUD

15 Q. You never -- well, let me ask you this.  
16 Are you aware of any confusion by anybody as to  
17 Phyllis Schlafly's American Eagles and Eagle Forum?

18 A. Oh, there's plenty of confusion about the  
19 lawsuits and the people that sued Phyllis. So  
20 that's -- there's plenty of confusion, but we worked  
21 hard to make sure people knew -- that c4 was pushing  
22 the Trump agenda for Phyllis, and so people  
23 recognized that pretty quick. And if they weren't  
24 for that agenda, they were perhaps not attracted to

Edward Martin, Jr.

June 4, 2019

Page 312

1     **it, but . . .**

2           Q.     And have you ever received any  
3     communications from anybody that were confused by  
4     the differences or similarities between PSAE and  
5     Eagle Forum?

6           A.     **I'm sure we've gotten correspondence**  
7     **on -- I don't recall when, but I'm sure you could**  
8     **show me some. The reality is the confusion between**  
9     **Eagle Forum, and Eagle Forum Education and Legal**  
10    **Defense Fund is more profound, more common than**  
11    **anything, but I'm sure there are examples.**

12          Q.     And when it was created in May of 2016,  
13    PSAE did not have any state organizations, correct?

14          A.     **I think that sounds correct.**

15          Q.     Citizen Empowerment League did not have  
16    any state organizations, correct?

17          A.     **I don't have knowledge of that.**

18          Q.     Okay. But when you took it over, there  
19    were no -- there may have been a bank account, but  
20    there were no state organizations associated with  
21    Citizen Empowerment League that you were aware of?

22          A.     **I was not aware of anything associated**  
23    **with Citizen Empowerment League, correct.**

24          Q.     And since there were no state

Edward Martin, Jr.

June 4, 2019

Page 313

1 organizations, there were no state leaders of  
2 organizations in May of 2016 when you created PSAE,  
3 correct?

4 **A. Affiliated with Phyllis Schlafly's**  
5 **American Eagles?**

6 Q. Correct.

7 **A. I think that's right, yes.**

8 (Plaintiff's Exhibit 12, previously  
9 marked, was identified for the record.)

10 **BY MR. SOLVERUD**

11 Q. Let me show you a document marked  
12 Exhibit 12.

13 **A. Okay.**

14 Q. Can you identify that as an email exchange  
15 between you and Kathleen Sullivan?

16 **A. And Andy at one point.**

17 Q. And on June 2, 2016, Andy suggests that  
18 you need to establish new state organizations with  
19 new state leaders for Phyllis Schlafly's American  
20 Eagles, correct?

21 **A. Yes, sir.**

22 Q. And he identifies five states to start  
23 with, right?

24 **A. Yes.**

Edward Martin, Jr.

June 4, 2019

Page 314

1 Q. And those states were Texas, Alabama,  
2 Colorado, Oklahoma, and Louisiana, right?

3 A. Yes, sir.

4 Q. And those states included the states where  
5 my clients were leaders as well as Louisiana, where  
6 Sandy McDade was a leader, correct?

7 A. I don't know whether -- some are missing,  
8 I think, right?

9 Q. Right. There's some that are missing, but  
10 all of the ones that are -- the five that are  
11 listing include Texas, where Cathie Adams was  
12 active, correct?

13 A. Uh-huh.

14 Q. Alabama where Eunie Smith was the state  
15 leader, correct?

16 A. Sure. Yes, sir.

17 Q. Colorado where Rosina Kovar was active,  
18 correct?

19 A. Yes, sir.

20 Q. Oklahoma, right, where Caroline McLarty  
21 was active, correct?

22 A. Yes, sir.

23 Q. And Louisiana where Sandy McDade was  
24 active, correct?

Edward Martin, Jr.

June 4, 2019

Page 315

1           **A.     She's not one of your clients, right?**

2           Q.     No, and I didn't say that.

3           **A.     Oh, sorry.   There's certainly**  
4 **those -- those are big states, but, yes, certainly**  
5 **that's right.**

6           Q.     Okay.   Well, do you know how Andy went  
7 about identifying these states?

8                     MR. ELSTER:   Objection.   Speculation.

9                     THE DEPONENT:   I don't recall having  
10 a conversation about that.

11           BY MR. SOLVERUD

12           Q.     Do you think it's just coincidence that  
13 four of the states include the states where my  
14 clients were actively involved, and the fifth one is  
15 where one of their supporters --

16                     MR. ELSTER:   Same objection.

17                     THE DEPONENT:   I don't know what to  
18 say.   I think Andy has got a lot of ideas.   You'll  
19 have to ask him about how he got them.

20           BY MR. SOLVERUD

21           Q.     And Andy says, "I'm happy to volunteer to  
22 lead this effort beginning immediately to establish  
23 new leadership."   Do you see that?

24           **A.     Yes, sir.**

Edward Martin, Jr.

June 4, 2019

Page 316

1 Q. And your response to Andy's proposal is,  
2 "I like this idea," correct?

3 A. No. My response is, "I like this idea, do  
4 you?" And I think it was forwarded to Kathleen  
5 Sullivan. So that's --

6 Q. Correct.

7 A. So that's not the same as what you read to  
8 me.

9 Q. Okay. Well, you responded, and then you  
10 ask a question. So your response to the idea is, "I  
11 like this idea." And then you say --

12 A. No, it's not a response. It's not a  
13 response to -- I don't send that to Andy.

14 Q. Okay.

15 A. I send that just to Kathleen. I'm not  
16 sure. It looks like -- I didn't send that to Andy.  
17 It's not response to Andy.

18 Q. Okay.

19 A. It's a forward to Kathleen, I think,  
20 saying, "Hey, I like this idea. Do you?"

21 Q. Okay. And Kathleen Sullivan said, "I  
22 think it's great," right?

23 A. She said a bunch of answers, yes, sir.

24 Q. Okay. And did, at some point, you go

Edward Martin, Jr.

June 4, 2019

Page 317

1 about executing this idea?

2 A. At some point we were talking about how to  
3 get more people attracted to Phyllis' vision for the  
4 c4 of the Trump agenda. We knew a lot of  
5 the -- well, the litigants were anti-Trump and  
6 pro-Cruz, and we were down the stretch run. So I  
7 think we did. I don't know what your -- I don't  
8 know how it went forward, but we certainly were  
9 looking for opportunities to attract people to  
10 Phyllis and her vision for that organization.

11 Q. And did you ever present those  
12 opportunities to the entire board of Eagle Forum?

13 MR. ELSTER: Objection. Form. To  
14 the extent it calls for a legal conclusion.

15 THE DEPONENT: I don't recall that.  
16 I think only Phyllis would have been the one that  
17 handled that. Kathleen is on that board, right?  
18 So -- and Andy is on that board. So I think --

19 BY MR. SOLVERUD

20 Q. Was this opportunity presented to the  
21 entire board --

22 MR. ELSTER: Same objection.

23 BY MR. SOLVERUD

24 Q. -- of Eagle Forum?

Edward Martin, Jr.

June 4, 2019

Page 318

1           **A.     I don't know that it was, no.**

2           Q.     Okay.

3           **A.     I don't know.   We were in litigation by**  
4 **then, so.**

5           Q.     You were in litigation, but you were still  
6 a board member -- well, strike that.

7                     You were in litigation, but you were still  
8 acting as president of Eagle Forum as of June 2016,  
9 correct?

10          **A.     Correct, yes, sir.**

11          Q.     Kathleen Sullivan was still a director of  
12 Eagle Forum, correct?

13          **A.     Yes, sir.**

14          Q.     And Andy Schlafly was still a director of  
15 Eagle Forum?

16          **A.     Yes, sir.**

17          Q.     John Schlafly was an officer and director  
18 of Eagle Forum, correct?

19          **A.     Yes.   Yes, sir.**

20          Q.     And at the time, you understood that Eagle  
21 Forum already had active organizations in each of  
22 the states identified by Andy Schlafly, correct?

23          **A.     Not pursuing the agenda we were pursuing.**

24          Q.     But you understood that there was



Edward Martin, Jr.

June 4, 2019

Page 319

1 an -- there were active organizations in each one of  
2 those states, correct?

3 **A. Well, there was a Red Cross in each state,**  
4 **too, but they didn't do the same thing as us, so.**

5 Q. Right.

6 **A. So I'm not sure in those states if there**  
7 **were organizations there. There was some people,**  
8 **but that was --**

9 Q. Well, we can take that one by one.

10 **A. Okay.**

11 Q. You knew there was a Texas Eagle Forum,  
12 correct?

13 **A. There was a Texas Eagle Forum.**

14 Q. You knew there was an Alabama Eagle Forum,  
15 correct?

16 **A. Yes, sir.**

17 Q. You knew there was a Colorado Eagle Forum?

18 **A. I don't think it was functional. I'm not**  
19 **sure Rosina had an organization going on.**

20 Q. Okay. So you're not sure about Colorado.

21 You understood there was an Oklahoma Eagle  
22 Forum, correct?

23 **A. Again, McLarty wasn't doing much, so.**

24 Q. Who was Bunny Chambers working with?

Edward Martin, Jr.

June 4, 2019

Page 320

1           **A.     She wasn't doing much either, I don't**  
2 **think, but --**

3           Q.     Which state is what --

4           **A.     What?**

5           Q.     Which state was Bunny Chambers working  
6 with?

7           **A.     You asked me about Oklahoma. I'm not**  
8 **sure. Was Bunny Chambers in Oklahoma?**

9           Q.     I'm asking you.

10          **A.     Well, I don't know. She didn't -- she**  
11 **wasn't much. Not much was happening in Oklahoma.**

12          Q.     Okay.

13          **A.     That's my --**

14          Q.     Louisiana? Did Louisiana have a state  
15 Eagle Forum?

16          **A.     I don't think it had a specific**  
17 **organization, but they might have.**

18          Q.     And did you or anybody else present these  
19 opportunities to the various state organizations?

20                   MR. ELSTER: Objection. Form. Legal  
21 conclusion as to "opportunity."

22                   THE DEPONENT: What opportunity?

23 BY MR. SOLVERUD

24          Q.     The opportunities that Andy is talking

Edward Martin, Jr.

June 4, 2019

Page 321

1 about.

2 MR. ELSTER: Same objection.

3 THE DEPONENT: Well, I'm not sure we  
4 did what Andy was talking about, but the difference  
5 in these opportunities were that the concern was  
6 Eagle Forum's board was not going to support the  
7 Trump agenda. Phyllis was pursuing a new c4 -- we  
8 were -- to make sure the Trump agenda. Those states  
9 you just listed -- go back through them if you'd  
10 like -- they all were just about -- I don't think  
11 they were Trumper, but they were anti-Trumper, so.

12 (Plaintiff's Exhibit 13, previously  
13 marked, was identified for the record.)

14 BY MR. SOLVERUD

15 Q. I've handed you a document marked  
16 Exhibit 13.

17 A. Yes, sir.

18 Q. This is an email exchange that includes  
19 yourself, Kathleen Sullivan, Andy Schlafly, and John  
20 Schlafly, correct?

21 A. Mm-hmm.

22 Q. This includes John's response to Andy's  
23 email that we talked about just a few minutes ago,  
24 correct?

Edward Martin, Jr.

June 4, 2019

Page 322

1           **A.    Yes, sir. Yes, sir.**

2           Q.    And John asked whether Andy's proposing to  
3    establish new leaders for PSAE or Eagle Forum,  
4    correct?

5           **A.    I don't see that. I'm sorry. Where is**  
6    **it? John is asking -- I don't see that.**

7           Q.    Okay. You don't see that? He  
8    says -- John says, "There's no new" -- "There's no  
9    need for new leadership in Colorado. Jayne  
10   Schindler is rock solid," correct?

11          **A.    That's what he wrote, yes.**

12          Q.    That's a reference to Jayne Schindler who  
13   was involved as an Eagle Forum leader in Colorado,  
14   correct?

15          **A.    Yes, sir.**

16          Q.    And then he says, "It's unclear if 'we' or  
17   'this' means Eagle Forum or some other entity,"  
18   correct?

19          **A.    Mm-hmm.**

20          Q.    He's trying to determine whether you're  
21   talking about Phyllis Schlafly's American Eagles or  
22   Eagle Forum doing what Andy is proposing, correct?

23          **A.    Mm-hmm.**

24          Q.    So he's confused as to what entity would

Edward Martin, Jr.

June 4, 2019

Page 323

1 be the right entity to do those, correct?

2 **A. Who is "he"?**

3 Q. John.

4 MR. ELSTER: Objection. Form. To  
5 the extent it mischaracterizes this email.

6 THE DEPONENT: Okay. I'm not sure.

7 BY MR. SOLVERUD

8 Q. Okay. And he says it's unclear who has  
9 authority to replace an existing state organization  
10 with a different leader. Do you see that?

11 **A. Yes, sir.**

12 Q. That's a reference to Eagle Forum because  
13 that was the only entity that had state  
14 organizations, correct?

15 MR. ELSTER: Same objections.

16 THE DEPONENT: Yes, I think so.

17 BY MR. SOLVERUD

18 Q. He says, "Letters from" -- I'm down to  
19 number 3 talks about Phyllis Schlafly's American  
20 Eagles. And he says, "Letters from that  
21 organization are being mailed and will soon be  
22 received." Did I read that correctly?

23 **A. Yes.**

24 Q. What letters were being mailed?

Edward Martin, Jr.

June 4, 2019

Page 324

1           **A.     I'm not sure I know the answer there.**

2           Q.     He says that "Phyllis Schlafly's American  
3     Eagles has been formed primarily addressing the  
4     sovereignty issues including immigration, trade, and  
5     globalism." Did I read that correctly?

6           **A.     Yes, sir.**

7           Q.     And Eagle Forum was actively involved with  
8     addressing sovereignty issues in June of 2016,  
9     correct?

10          **A.     The concern was that the anti-Trump people**  
11     **were backing up -- backing down on supporting him.**  
12     **So that -- on those issues, the broad description is**  
13     **okay, sovereignty issues, but the concern was we**  
14     **need to be able to be out there advocating as Trump**  
15     **had done and as Trump had articulated. That was not**  
16     **something the majority of the board was comfortable**  
17     **with.**

18          Q.     And there's no reference to Trump anywhere  
19     on 13, is there?

20          **A.     There wasn't anywhere in the world where**  
21     **Trump wasn't the topic of mine in June 2, 2016.**

22          Q.     And his name doesn't show up anywhere in  
23     Exhibit 13, does it?

24          **A.     This is an organization. That's what we**

Edward Martin, Jr.

June 4, 2019

Page 325

1 were working on was the presidential election and  
2 all the issues surrounding it, so.

3 Q. So the answer to my question is "yes"?  
4 His name does not show up on Exhibit 13?

5 A. No, his name doesn't show up.

6 Q. And somebody else's name doesn't show up  
7 on Exhibit Number 13. That's Phyllis Schlafly,  
8 correct?

9 A. No. It's on there.

10 Q. Did she send or receive any of these  
11 emails?

12 A. It's number 3. Phyllis Schlafly. Her  
13 name is there.

14 Q. Right. The new organization called  
15 "Phyllis Schlafly's American Eagles," right?

16 A. Her name is there, yes, sir.

17 Q. Did she send or receive any of these  
18 emails?

19 A. It doesn't look like it, no.

20 Q. Does she send or receive any emails  
21 reflected in Exhibit 12?

22 A. 12? It doesn't look like it.

23 Q. You asked Kathleen Sullivan to get John to  
24 buck up. What's that in reference to?

Edward Martin, Jr.

June 4, 2019

Page 326

1           A.     John is a deliberative man, and so he has  
2     concerns that he expresses that are very, very  
3     helpful. And if you see, Kathleen's description is  
4     apropos, for all of this, was brainstorming, and so  
5     the idea was to see what John thought. John  
6     is -- Kathleen is a long enough friend and colleague  
7     of John's that it's a different conversation than me  
8     and John talking. So I thought it would be  
9     important for her to talk to John and see what he  
10    thought.

11          Q.     And in your June 2nd email, you also say,  
12    "I agree with Andy, and you can see John is less  
13    so." Did I read that correctly?

14          A.     That's what I wrote, yes, sir.

15          Q.     You were agreeing with Andy's proposal to  
16    establish new state organizations?

17          A.     No, sir.

18          Q.     No? What were you agreeing on?

19          A.     I think I agreed with Andy's instinct.  
20    Andy is the kind of guy that comes up with lots of  
21    bullet points and plans, and I -- so I think I was  
22    agreeing broadly, but after that, I think the  
23    details would have needed to be worked out, and I  
24    think we did some of what he said. We tried to



Edward Martin, Jr.

June 4, 2019

Page 327

1 track people in different states, but I think it was  
2 not quite according to that.

3 (Plaintiff's Exhibit 14, previously  
4 marked, was identified for the record.)

5 BY MR. SOLVERUD

6 Q. Let me show you a document that's  
7 previously been marked PSAE 14.

8 A. Sure, mm-hmm.

9 THE DEPONENT: I need a break.

10 MR. ELSTER: Can we take a break?

11 THE VIDEOGRAPHER: Off the record at  
12 4:50 p.m.

13 (Whereby a short break was taken.)

14 THE VIDEOGRAPHER: Back on the record  
15 at 4:58 p.m.

16 BY MR. SOLVERUD

17 Q. I hand you a document marked Exhibit 14.

18 A. Yes, sir.

19 Q. This is a draft announcement or press  
20 release of the creation of the Florida charter of  
21 Phyllis Schlafly Center for Protecting the  
22 Constitution; is that right?

23 A. Let me read the whole thing.

24 Q. Okay.

Edward Martin, Jr.

June 4, 2019

Page 328

1           **A.    Yes, sir.**

2           Q.    And the purpose of the constitutional  
3 centers were to fight the Con-Con; is that right?

4           **A.    Protect the Constitution.**

5           Q.    And defeat any call or resist any call for  
6 a new constitutional convention, correct?

7           **A.    Well, I'd say, yes. I mean, yes.**

8           Q.    And I'm reading from the quote attributed  
9 to Phyllis Schlafly. Do you see that?

10          **A.    Yes, sir.**

11          Q.    And so that was -- the primary objective  
12 of these Florida Centers for Protecting the  
13 Constitution -- this Florida Center to Protect the  
14 constitution?

15          **A.    No.**

16          Q.    No? What was the --

17          **A.    Protecting the Constitution was the**  
18 **primary focus.**

19          Q.    Okay.

20          **A.    At the time, this is -- one of the issues**  
21 **is the constitutional convention threat.**

22          Q.    So it was protect the Constitution, and  
23 also to resist any constitutional convention; is  
24 that true?

Edward Martin, Jr.

June 4, 2019

Page 329

1           A.     It was a -- well, the idea was  
2     Phyllis' -- one of Phyllis' long-standing focuses  
3     was on the Constitution back from when she served on  
4     the bicentennial commission in the '80s, and we had  
5     one of our board members, who has a constitution  
6     museum, we had -- so this was a way to get our  
7     organization, Eagle Forum Education and Legal  
8     Defense Fund, specifically c3, focused on educating  
9     on these key issues. It was a new -- it was -- the  
10    idea was a new initiative.

11          Q.     And EFELDF already had leaders in Florida  
12    that could have been involved in that process,  
13    right?

14          A.     Well, I'm not sure what that means.

15          Q.     Well, why not use any of the Florida  
16    chapter Eagle Forum for this Center for Protecting  
17    the Constitution?

18          A.     We're looking for new people that were --

19          Q.     And how were Cindy and Ian Northon  
20    selected?

21          A.     They were referred by maybe Kathleen  
22    Sullivan initially, but they may have been those  
23    around conservative circles. They're from Michigan  
24    originally, so I'm not sure.

Edward Martin, Jr.

June 4, 2019

Page 330

1 Q. What discussions did you have with Ian  
2 Northon and Cindy Northon about the Florida Center  
3 for Protecting the Constitution?

4 A. I don't recall those. I think I talked  
5 to -- I think I talked to both of them, but I'm not  
6 sure what the details were.

7 Q. Well, at the time you were president of  
8 EFELDF, right?

9 A. Eagle Forum Education and Legal Defense  
10 Fund, yes, sir.

11 Q. Yes. You would have been the one  
12 responsible for identifying the leaders of the  
13 Florida Center for Protecting the Constitution?

14 A. Yes.

15 Q. And so you would have -- you would have  
16 vetted them, correct?

17 A. Yeah, that's right. That's fair.

18 Q. What events did the Florida Center for  
19 Protecting the Constitution conduct?

20 A. I don't think -- I didn't get off to a  
21 strong start. What happened here was Florida -- you  
22 mentioned the leaders. They failed to stop the  
23 Con-Con, so we were worried about it, and that's why  
24 we got going, and I don't think that this with

Edward Martin, Jr.

June 4, 2019

Page 331

1 Florida really took off. It was -- it took a long  
2 time for us to figure out how to make this work for  
3 protecting the Constitution.

4 Q. And did it ever work?

5 A. It's kind of something -- a work in  
6 progress, but, yes, we have people that are doing a  
7 good job of educating and protecting the  
8 Constitution and identifying these things, yes.

9 Q. And as of June 22, 2016, Eagle Forum's  
10 Florida state chapter was already working to oppose  
11 the constitutional convention in Florida, correct?

12 A. Well, it had passed in Florida, so that  
13 was the problem. And I don't recall whether they  
14 were working on it or not.

15 Q. And did you present the opportunity for  
16 the Florida Center for Protecting the Constitution  
17 to the Eagle Forum board of directors?

18 MR. ELSTER: Objection. Form. Legal  
19 conclusion as to "opportunity."

20 THE DEPONENT: It's a c3. It was a  
21 c3 project, so it wouldn't have been appropriate for  
22 them.

23 BY MR. SOLVERUD

24 Q. You have it framed as the c3 project?

Edward Martin, Jr.

June 4, 2019

Page 332

1           **A.     Correct.**

2           Q.     But it was actually something that was  
3     being done previously at the state levels through  
4     the c4, correct?

5           **A.     No, sir.**

6           Q.     No?

7           **A.     No.   So it was unique.   If you read it, it**  
8     **was uniquely designed.**

9           Q.     What was -- where are the designing papers  
10    for this?

11          **A.     I don't know what that means.**

12          Q.     Well, where are the papers that showed the  
13    design?

14          **A.     Well, I'm describing what we did.**

15          Q.     I know, but I'm asking you a different  
16    question. I'm asking you where is the paperwork  
17    that shows the design?

18          **A.     Oh, the design is in the description of**  
19    **what we're doing. It's not -- there's not design**  
20    **papers.**

21          Q.     Okay. So it's uniquely designed, but  
22    there's nothing designing it?

23          **A.     Is that a question?**

24          Q.     Yes.

Edward Martin, Jr.

June 4, 2019

Page 333

1           A.     It's -- the Center for Protecting the  
2     Constitution were a particular focus on Phyllis'  
3     legacy on educating and understand the Constitution  
4     and threats to it, whether that included patents,  
5     whether that included Con-Con in different places.

6                 In Florida, the Eagles down there failed,  
7     I guess -- I don't remember -- to stop a call for  
8     the Constitution. So the education about the  
9     threats to the Constitution was important, and that  
10    was a new initiative that Phyllis had approved of  
11    and thought was worthwhile.

12           Q.     What monies did EFELDF provide to the  
13    Florida Center for Protecting the Constitution?

14           A.     I don't recall what was done. I'm not  
15    sure. This said, "draft." I'm not sure even how  
16    far this went forward in terms of what was done. I  
17    don't recall that now.

18           Q.     Are you aware of any monies that were  
19    spent by EFELDF on Centers for Protecting the  
20    Constitution?

21           A.     Yes.

22           Q.     How much money was budgeted by EFELDF for  
23    Centers for Protecting the Constitution?

24           A.     At various times, it was \$20,000 to

Edward Martin, Jr.

June 4, 2019

Page 334

1     \$25,000 a chapter, and the boards -- the board  
2     approved. I think we started out with 4 or 5,  
3     so -- but that's -- that wasn't always -- we didn't  
4     always use that money.

5           Q. And in Florida, is there a separate entity  
6     that was created?

7           A. I'm not sure I understand the question.

8           Q. Okay. The Centers for Protecting the  
9     Constitution, were they separate entities?

10          A. From what?

11          Q. Are they corporations?

12          A. No.

13          Q. Are they LLCs?

14          A. No.

15          Q. Okay.

16          A. They're just -- they're a sort of project  
17     of our Eagle Forum Education and Legal Defense Fund.

18          Q. And so when you say that each state  
19     senator will receive support from the fund to cover  
20     staff printing and other related expenses, that  
21     money is going directly to the directors to fund  
22     their activities through the Centers for Protecting  
23     the Constitution?

24          A. No, sir.



Edward Martin, Jr.

June 4, 2019

Page 335

1 Q. Okay. Well, who are you giving the money  
2 to then?

3 A. Well, as they needed it. The idea was to  
4 give a stipend to a director. It's not a full-time  
5 job, and then as they needed it for printing costs  
6 or something, they would get approval, and we would  
7 print that, so.

8 Q. Okay.

9 A. It was -- if your question was -- it  
10 sounded like you were asking if it was lump sum  
11 payments. It wasn't that.

12 Q. Okay. How much was the stipend?

13 A. Well, at the time, I'm not sure we had  
14 that nailed down here.

15 Q. Okay. Well, how much is the stipend now?

16 A. It's \$1,500 for our constitution centers  
17 per month, for the individuals that do that work.

18 Q. What amount of money was paid to Cindy and  
19 Ian Northon for their stipend?

20 A. I don't recall that. I'm not sure we even  
21 got going with this one.

22 Q. Is there a Center for Protecting the  
23 Constitution in Florida?

24 A. There is.

Edward Martin, Jr.

June 4, 2019

Page 336

1 Q. And who are the directors?

2 A. Well, Priscilla Gray is the staffer who  
3 works on that.

4 Q. Was she the director?

5 A. I'm not sure if we used that term, but  
6 maybe we do. It's a very flat -- there's not a lot  
7 of --

8 Q. Do you pay Priscilla Gray a stipend?

9 A. Eagle Forum Education and Legal Defense  
10 Fund, yes.

11 Q. How much?

12 A. \$1,500 a month.

13 Q. A month?

14 A. Yes, sir.

15 Q. And where else did you create these  
16 Centers for Protecting the Constitution?

17 A. Montana, Colorado, Iowa. Sorry. There  
18 must be another -- I'd have to get a list. I can't  
19 think right now.

20 Q. Who is the director in Iowa?

21 A. Tamara Scott.

22 Q. And did she receive \$1,500 a month?

23 A. I think so, yes, sir.

24 Q. And Montana?

Edward Martin, Jr.

June 4, 2019

Page 337

1           **A.     Eric Olsen.**

2           **Q.     Does he receive --**

3           **A.     Yes, sir.**

4           **Q.     Colorado?**

5           **A.     Did I say Colorado?**

6           **Q.     I thought you did. I wrote --**

7           **A.     Nevada. I didn't mean Colorado.**

8           **Q.     Who is --**

9           **A.     Vicki Dooling.**

10          **Q.     Did she receive --**

11          **A.     Yes, sir.**

12                   **Oh. California is the one I said. That**  
13 **was William Woodrew (sp).**

14          **Q.     What about Utah?**

15          **A.     Utah, no, sir.**

16                   **(Plaintiff's Exhibit 15, previously**  
17 **marked, was identified for the record.)**

18          **BY MR. SOLVERUD**

19           **Q.     Let me show you a document that's been**  
20 **marked as Exhibit 15 in a prior deposition. This is**  
21 **your email to Kathleen Sullivan appointing her state**  
22 **president of Phyllis Schlafly's American Eagles?**

23           **A.     It says that. I wonder if -- I see that.**

24           **It says that, I guess.**

Edward Martin, Jr.

June 4, 2019

Page 338

1 Q. Okay. And you say, "We are appointing you  
2 a state president of Phyllis Schlafly's American  
3 Eagle. Phyllis Schlafly's -- or PS American Eagles  
4 is a new c4 organization that Phyllis has started to  
5 fight for the Constitution and especially against  
6 the globalists regarding trade and immigration."  
7 Did I read that correctly?

8 **A. Yes, sir.**

9 Q. And PSAE is the new c4 that you're  
10 referring to in this email, correct?

11 **A. Yes, sir.**

12 Q. And it was started to fight for the  
13 Constitution, and especially against the globalists  
14 regarding trade and immigration, correct?

15 **A. What -- I'm sorry. I don't understand the**  
16 **question. You're reading it again? That's what it**  
17 **says on this paper, yes.**

18 Q. Yeah. That's true, correct?

19 **A. It was certainly part of it. It was**  
20 **Phyllis' effort to get her c4 voice out there, yes.**

21 Q. Okay. And it says, "As a c4 organization,  
22 we work in politics and push to have good policies  
23 enacted at the local, state, and federal level,"  
24 correct?

Edward Martin, Jr.

June 4, 2019

Page 339

1           **A.     It says that, yes.**

2           Q.     And that's a true statement, too?

3           **A.     Yes, part of it.**

4           Q.     Okay. And then there's contact  
5 information for Pat Carlson and Cherilyn Eager?

6           **A.     Yes, sir.**

7           Q.     Do you know why that's there?

8           **A.     No. I wonder if this is me saying -- that**  
9 **there's an exchange that we're missing that is about**  
10 **what Kathleen would be calling or I'm calling these**  
11 **folks to talk to them about that.**

12          Q.     Okay.

13          **A.     I don't remember now how that went, so I'm**  
14 **not sure what -- it looks incomplete.**

15          Q.     And the notion would be that you would  
16 call Pat Carlson to talk about the opportunity to be  
17 state president of Phyllis Schlafly's American  
18 Eagles; is that right?

19          **A.     That -- I'm not sure. This is a funny**  
20 **exchange. I don't know whether I was sending her**  
21 **the phone numbers or if I had them for myself. I'm**  
22 **not sure why.**

23          Q.     Well, did you appoint Pat Carlson as the  
24 state president?

Edward Martin, Jr.

June 4, 2019

Page 340

1           **A.     I don't think so, no.**

2           Q.     Has she ever been state president or  
3 chapter president for PSAE?

4           **A.     I think she wanted to be involved and then**  
5 **maybe stopped. I can't recall that.**

6           Q.     Did you --

7           **A.     I'm not sure.**

8           Q.     Did you appoint Cherilyn Eager state  
9 president of Utah?

10          **A.     Cherilyn played lots of different roles.**  
11 **I'm not sure if that was the title, a title. I'm**  
12 **not sure about that.**

13          Q.     She played lots of different roles in  
14 PSAE, though?

15          **A.     No. In our organization -- in the Phyllis**  
16 **Schlaflly world, she had had -- she did some things**  
17 **with radio. She did some things -- so I don't know**  
18 **whether she ever got that title. She doesn't live**  
19 **in Utah, so, anymore.**

20          Q.     Where does she live now?

21          **A.     I think she lives in California.**

22                 **(Plaintiff's Exhibit 16, previously**  
23 **marked, was identified for the record.)**

24          **/ / /**

Edward Martin, Jr.

June 4, 2019

Page 341

1 **BY MR. SOLVERUD**

2 Q. I'll show you what's marked as Exhibit 16.  
3 This is an email that Andy sent to you, John, and  
4 Kathleen on August 28, 2016, correct?

5 **A. Yes, sir.**

6 Q. And he says, "As a director of Phyllis  
7 Schlafly's American Eagles, I'd like to roll this  
8 out in key states. Let's start appointing state  
9 leaders as in Utah where Cherilyn Eager has been  
10 doing fantastically." Did I read that correctly?

11 **A. Yes, sir.**

12 Q. Does that refresh your recollection as to  
13 what Exhibit 15 is?

14 **A. No, sir.**

15 Q. Okay. Well, Exhibit 15 is dated  
16 August 22, two days after you received this email  
17 from Andy Schlafly, correct?

18 **A. Okay.**

19 Q. And so two days after you received the  
20 email from Andy Schlafly, you were communicating  
21 with Kathleen Sullivan about setting up these new  
22 state leaders and specifically mentioning Cherilyn  
23 Eager for Phyllis Schlafly's American Eagles,  
24 correct?

Edward Martin, Jr.

June 4, 2019

Page 342

1           A.     What you stated was incorrect. The first  
2 email has been -- includes Kathleen Sullivan. So I  
3 think between the 20th on Saturday and the 22nd,  
4 there must have been some discussion, because  
5 Kathleen's on the first email, and that might  
6 explain why there's the language on the second one.  
7 I just don't recall that. I don't know the timing,  
8 or I don't really know if there was a title to it,  
9 but . . .

10                   (Exhibit 17, previously marked, was  
11 identified for the record.)

12 BY MR. SOLVERUD

13           Q.     Let me show you a document marked Exhibit  
14 17.

15           A.     Okay.

16           Q.     By the way, with respect to 16, it's not  
17 sent to all the directors, though, of PSAE, is it?

18           A.     It looks like it's sent only to  
19 the -- it's not to -- Phyllis isn't included on that  
20 email.

21           Q.     Right. And neither is Ray Wotring,  
22 correct?

23           A.     I guess that's right. I mean, he's not on  
24 there, because -- is he still on that board? I'm



Edward Martin, Jr.

June 4, 2019

Page 343

1     **not sure.**

2           Q.     And with respect to Exhibit 15 that we  
3     looked at, your email with Kathleen Sullivan,  
4     Phyllis Schlafly is not on that email either?

5           A.     **It doesn't look like it. Well, that's**  
6     **directly from her to me. So that's one person, but,**  
7     **no.**

8           Q.     And with respect to Exhibit 14, your draft  
9     of the press release, Phyllis Schlafly's not on that  
10    one either?

11          A.     **Correct.**

12          Q.     And by the way, you provided a copy of the  
13    draft press release in Exhibit 14 to Ian Northon and  
14    told him to review it, right?

15          A.     **That's both -- the language there says,**  
16    **yes. I think I talked to his wife, Mrs. Northon, on**  
17    **the phone about it, but I can't recall.**

18          Q.     Well, what did you talk with either Cindy  
19    or Ian about the Florida Center for Protecting the  
20    Constitution?

21          A.     **Their interest in helping with that**  
22    **effort, with that issue and that effort.**

23          Q.     And what did they tell you?

24          A.     **I think that -- if I recall again, I don't**

Edward Martin, Jr.

June 4, 2019

Page 344

1 think it got off the ground, but I think they were  
2 interested.

3 Q. Did it not get off the ground because of  
4 something they did or didn't do?

5 A. No. I think it was a busy time, and most  
6 of the -- most of the constitution center efforts  
7 happened months later. Next year, I think. Even  
8 longer, actually.

9 Q. Which one do you have in front of you  
10 right now?

11 MR. ELSTER: 17.

12 MR. SOLVERUD: Okay.

13 BY MR. SOLVERUD

14 Q. Can you identify Exhibit 17 as an email  
15 exchange between you and Ryan Hite?

16 A. Yes, sir.

17 Q. And who is Ryan Hite?

18 A. Communications director for Eagle Forum  
19 Education and Legal Defense Fund.

20 Q. Did he also perform services for PSAE?

21 A. No. Sometimes I think he would help with  
22 things, but he was an Eagle Forum Education and  
23 Legal Defense Fund employee.

24 Q. You asked Ryan Hite to prepare a letter

Edward Martin, Jr.

June 4, 2019

Page 345

1 for you that could be sent on behalf of Phyllis  
2 Schlafly's American Eagles granting Kathleen  
3 Sullivan and Michelle D'Agostino permission and  
4 authority to establish a Florida chapter of Phyllis  
5 Schlafly American Eagles, correct?

6 **A. Well, actually, I think part of it was**  
7 **the -- the reason this was created was the**  
8 **intellectual property as much as the chapter,**  
9 **because, again, that was a factor, but -- so I think**  
10 **it was both of those things. The chapter was being**  
11 **created. Kathleen was on the board obviously. And**  
12 **also this written and oral intellectual property was**  
13 **a factor.**

14 Q. Earlier you testified you didn't  
15 understand what the word "intellectual properties"  
16 meant.

17 **A. I don't think that's what I testified.**

18 Q. Okay. So now you do. So you do  
19 understand -- well, tell me what you understand  
20 "intellectual property" to mean.

21 **A. Well, I know what Phyllis was asserting**  
22 **about her written work and intellectual property.**  
23 **So I don't know some of the specifics of --**

24 Q. Tell me what you understand -- if you

Edward Martin, Jr.

June 4, 2019

Page 346

1 understand the word "intellectual property," tell me  
2 what you understand it to mean.

3 **A. The property Phyllis created in her life.**

4 Q. And what property are you referring to in  
5 this email draft letter that says, "written and oral  
6 intellectual property"?

7 **A. One of the things that Phyllis did while**  
8 **she was alive was send a message to anyone who was**  
9 **affiliated with her asking that they seek permission**  
10 **to utilize her name and intellectual property and**  
11 **all those things. That was her preference. So**  
12 **this -- and the -- as the president of Eagle Forum**  
13 **Education and Legal Defense Fund, I was -- I played**  
14 **a role to help clarify that. So I think that's how**  
15 **this overlap happened, but I'm not really sure. I'd**  
16 **have to go back and look at where that language came**  
17 **from.**

18 Q. Did Kathleen Sullivan and Michelle  
19 D'Agostino establish a Florida chapter of Phyllis  
20 Schlafly's American Eagles?

21 **A. Yes, sir.**

22 Q. Who is Michelle D'Agostino?

23 **A. A woman from down in Florida.**

24 Q. And does the Florida chapter -- what does

Edward Martin, Jr.

June 4, 2019

Page 347

1 the Florida chapter of Phyllis Schlafly's American  
2 Eagles do?

3 **A. I think that would be a question for**  
4 **Kathleen Sullivan as to the direction day to day,**  
5 **but certainly it's consistent with what Phyllis**  
6 **wanted.**

7 Q. How many state chapters does Phyllis  
8 Schlafly's American Eagles exist?

9 **A. I don't know off the top of my head.**

10 Q. What states does Phyllis Schlafly's  
11 American Eagles have chapters in?

12 **A. I still don't know -- I don't know that**  
13 **answer.**

14 Q. Did you have any role or involvement in  
15 the registration of a website for PSAE?

16 **A. I don't think so. I'm not sure, though.**

17 **(Plaintiff's Exhibit 73, previously**  
18 **marked, was identified for the record.)**

19 **BY MR. SOLVERUD**

20 Q. Let me show you a document marked  
21 Exhibit 73 from a previous deposition. Let me know  
22 after you've had a chance to look at it.

23 **A. Yes, sir.**

24 Q. Tell me what this is.

Edward Martin, Jr.

June 4, 2019

Page 348

1           A.     It looks like a proposal from -- either  
2     from Bill or one that Bill had sent and was  
3     fine-tuned. I'm not sure.

4           Q.     So it's your understanding that Bill  
5     Wilson prepared the Trump Promotion Project, TPP  
6     2018?

7           A.     I think if I recall correctly, this was  
8     something -- an idea that Bill worked on, and I  
9     think I tried to craft it and clean it up to be in  
10    the direction that I thought it would make sense for  
11    us, our organization, and what we're doing, but I  
12    don't remember too specifically if this is the final  
13    form or what this was. It looks like some kind of  
14    draft, but I think I helped get it closer to what we  
15    do, so.

16          Q.     The masthead on the first page of the  
17    Trump Promotion Project has the Eagle Forum logo,  
18    right?

19          A.     Yes, sir. Well, Phyllis' logo, but the  
20    Eagle logo, yes.

21          Q.     Okay. And under it says, "Phyllis  
22    Schlafly Eagles"?

23          A.     Yes, sir.

24          Q.     And was this Trump Promotion Project

Edward Martin, Jr.

June 4, 2019

Page 349

1 supposed to be something for Phyllis Schlafly's  
2 Eagles to work on?

3 A. I don't recall right now. I think, again,  
4 this was -- I think I probably helped with that logo  
5 and maybe trying to get it in a direction, but you  
6 can see where -- if you read it, it's incomplete.  
7 It's got some ideas. It's -- I think it was sort of  
8 a pitch document that is early on.

9 Q. Did you pitch this document to anybody?

10 A. Well, I meant that they were pitching it  
11 to us, and we were -- to me, and so I think we  
12 looked at it, and certain parts of it made sense.

13 Q. And did you pitch it to anybody?

14 A. I think I talked to John about it.

15 Q. Okay. Did you talk to anybody else?

16 A. I don't recall that.

17 Q. Did you present it to the board of Phyllis  
18 Schlafly's American Eagles?

19 A. I don't think that would have happened,  
20 no. I'm not sure.

21 Q. Did you present it to the board of EFELDF?

22 A. Again, I don't know. I don't think  
23 that -- the timing of it. I'm not sure. June -- I  
24 don't know if it came up in the September meeting or

Edward Martin, Jr.

June 4, 2019

Page 350

1 not. I don't know the answer to that.

2 Q. Okay. If you turn to the second page,  
3 there's a reference that says, "To accomplish these  
4 goals, the following program is suggested using  
5 outside organizations with no direct tie to the  
6 White House." Why was there not supposed to be any  
7 direct tie to the White House?

8 A. Again, that's -- this is a draft. I think  
9 that's -- I'm not sure what that means, except that  
10 we want to be independent of the White House. We  
11 want to support the agenda, but we're not going to  
12 be directed by the White House. I think there's  
13 lots of reasons for that.

14 Q. And it talks about constructing the base.  
15 Do you see that?

16 A. Yes, sir.

17 Q. And if you go to the next page, the first  
18 bullet heading, it says, "All recruitment can be  
19 done via a 501(c)(3) entity"?

20 A. Mm-hmm.

21 Q. What 501(c)(3) entity are you referring to  
22 there?

23 A. Well, I'm not sure that's what I mean.  
24 I'm not sure we got down to that. It could be the



Edward Martin, Jr.

June 4, 2019

Page 351

1 Eagle Forum Education and Legal Defense Fund. It  
2 could have been another part of the organization. I  
3 think it's Eagle Forum -- see, even the language in  
4 the next line is not our language, Eagle Forum  
5 Foundation. That's not -- that's kind of --

6 Q. You've actually used that language in the  
7 past?

8 A. Yeah, but it's not -- it would be a  
9 shorthand that wouldn't make sense here, I don't  
10 think, here, but, again, I don't think we -- I don't  
11 know. I don't know more.

12 Q. Well, the second bullet heading says, "In  
13 each of the targeted districts or states, a local  
14 leader of the Eagle Forum Foundation would serve as  
15 the media focal point and leader." Do you see that?

16 A. Yes, sir.

17 Q. What's your understanding as to what is  
18 being referred to as the Eagle Forum Foundation?

19 A. I think that's EFELDF, right? I think  
20 that's EFELDF, but I'm not sure.

21 Q. And what districts or states were  
22 targeted?

23 A. Well, this plan wasn't implemented, and  
24 the list -- there's a list on there of lots of -- a

Edward Martin, Jr.

June 4, 2019

Page 352

1 wish list, but this is sort of, again, a plan that I  
2 don't think was implemented. So go ahead.

3 Q. Are you done?

4 A. Yes.

5 Q. And under deployment --

6 A. Yes, sir.

7 Q. -- there's a paragraph, second paragraph  
8 starts, "In each of the targeted areas, the Phyllis  
9 Schlafly Eagle leader would be responsible for  
10 recruiting a public face, the attack dog as it  
11 were."

12 A. Yes. That's definitely not. . .

13 Q. Who were you referring to as the Phyllis  
14 Schlafly Eagle leader?

15 A. Well, I think that's a term, again, in  
16 this pitch document that we're talking about. They  
17 use the term "Phyllis Schlafly Eagle" at the front,  
18 so it would be someone who would play that role.

19 Q. And from what organization would that  
20 person be from?

21 A. I was recruitment, so I'm not sure. I  
22 think we were saying "recruited," so.

23 Q. Under the bullet heading, there's a bullet  
24 that says, "An interview of the activists c-4

Edward Martin, Jr.

June 4, 2019

Page 353

1 leaders by the c-3 leader on the issue at hand to be  
2 broadcast on Public Access and YouTube." And is  
3 that a reference to c4 leader -- is that a reference  
4 to Phyllis Schlafly's American Eagles?

5 **A. I don't know. I don't recall that.**

6 Q. The targets are identified on the next  
7 page.

8 **A. Yes.**

9 Q. Correct?

10 **A. Yes, sir.**

11 Q. And number 1 is Dent?

12 **A. Yes, sir.**

13 Q. And we talked about him before, didn't we?

14 **A. Okay. Yes, sir.**

15 Q. And why was he a target?

16 **A. Well, Pennsylvania is really important,**  
17 **and he was particularly unhelpful on some of the**  
18 **issues, misunderstanding the issues. So he would be**  
19 **someone we were not excited about his understanding**  
20 **of the key issues as with some of these others, but,**  
21 **again, I don't -- there's a lot of targets on there,**  
22 **and I don't think that was -- this is a early draft**  
23 **or a wish list.**

24 Q. You wanted to remove Dent or prevent him

Edward Martin, Jr.

June 4, 2019

Page 354

1 from being reelected, correct?

2 A. I wanted to make clear that he needed to  
3 have a better understanding of the Trump agenda and  
4 issues, so --

5 Q. And unless he -- without that better  
6 understanding, he should go?

7 A. It's a different question. It was early  
8 enough in this process that we knew the way politics  
9 works, we could make a point and modify people's  
10 behavior on issues by understanding politics. That  
11 was a lot later to have a discussion if somebody  
12 wanted to --

13 Q. The next page references, "This would then  
14 require us to establish operations in 13 states."

15 A. Yes, sir.

16 Q. And right about the same time, that's what  
17 you're trying to do with respect to Phyllis  
18 Schlafly's American Eagles is establish operations  
19 in additional states, correct?

20 A. I guess if you tell me that on the timing.  
21 Again, that's an indication that this was a wish  
22 list and a pitch document by a consultant because  
23 that's too many that we couldn't do.

24 Q. And you stated, "Phyllis Schlafly Eagles

Edward Martin, Jr.

June 4, 2019

Page 355

1 has existing contacts in all those states," correct?

2 A. I don't think I say that. I don't think I  
3 would say I'm the author of that document. This  
4 document says that, and so I think what I'm telling  
5 you is this was a draft of something, and I'm not  
6 sure we have -- in all those states, but maybe.

7 Q. Does Phyllis Schlafly's American Eagles  
8 have existing contacts in those states?

9 A. Some, but not all.

10 Q. Did Eagle Forum have contacts in those  
11 states?

12 A. Same answer probably. Some, but not all.  
13 I'm not sure.

14 Q. It says, "Where needed, we can recruit a  
15 younger person to take the lead and be mentored by  
16 the old guard." What would the old guard be?

17 A. Somebody like Ned in Pennsylvania that had  
18 been around a while.

19 Q. And you say, "I know people in" -- it  
20 says, "I know people in Idaho who would jump at the  
21 chance to do this." Who do you know in Idaho?

22 A. That's why this is not written by me. I  
23 think either Bill Wilson or one of his team did a  
24 lot of work in Idaho. So that's -- I think that's

Edward Martin, Jr.

June 4, 2019

Page 356

1     **their -- I mean, I know only a few people in Idaho,**  
2     **but I think -- that's why it gives me --**

3           Q.     Where is Tammy Kasba (sp)?

4           A.     Iowa.

5           Q.     Iowa.

6           A.     You mean Tammy Nichols. She's in Idaho.

7           Q.     Okay. This document says that -- you  
8     attach the document to the email.

9           A.     Yes, sir. I agree with that.

10          Q.     Okay. I mean --

11          A.     But this was never implemented, this  
12     document. And my point here is that I think this  
13     was a pitch from Wilson or his team, and we were  
14     talking about whether it fit together what we're  
15     doing. It's way more money than we could have done,  
16     so it's -- it's kind of unclear to me, and that's  
17     not language I would use.

18          Q.     It says, "I firmly believe" -- I'm at the  
19     bottom under concluding thoughts. It says, "With  
20     the right support from friends in Trump world, which  
21     we have, the c-4 fund should be forthcoming. I  
22     firmly believe the c-3 money will be raised once the  
23     program is shown to key donors and supporters. As  
24     we have discussed, the high dollar gifts were not

Edward Martin, Jr.

June 4, 2019

Page 357

1 solicited in the past." When you say, "High dollar  
2 gifts were not solicited in the past," what are you  
3 referring to?

4 **A. This is not -- I mean, again, I can debate**  
5 **this. This doesn't strike me, as I'm reading,**  
6 **something that doesn't sound like my language. I**  
7 **will say that, yeah, because I don't know what that**  
8 **means, the friends in the Trump world. That**  
9 **doesn't -- but we had not had a real high donor plan**  
10 **of any of Phyllis' organizations. It was -- there**  
11 **was -- we needed to develop that, still do.**

12 Q. I mean, Eagle Forum, you know, did not  
13 solicit high net worth individuals for high dollar  
14 gifts, you know, under your leadership or even  
15 Phyllis' before that?

16 **A. That's incorrect.**

17 Q. That's not correct?

18 **A. That is incorrect.**

19 Q. Okay.

20 **A. We didn't do much of it, but that is**  
21 **incorrect.**

22 Q. Okay. Eagle Forum, under your leadership,  
23 didn't have a successful, you know, high net worth,  
24 high dollar solicitation program?

Edward Martin, Jr.

June 4, 2019

Page 358

1           **A.     That's also incorrect.**

2           **Q.     Okay. Tell me about the successes of the**  
3           **high net worth, high dollar solicitation program**  
4           **that you were responsible for.**

5           **A.     We worked up a plan for Phyllis to solicit**  
6           **money from Paula Keinath and got a large**  
7           **contribution.**

8           **Q.     How much?**

9           **A.     I can't recall now. It was -- I think we**  
10          **asked for 350 and got 200, something like that.**

11          **Q.     Okay.**

12          **A.     So there was -- it was a challenge, but it**  
13          **was something that we were aware of.**

14          **Q.     At the top of the last page, it says, "But**  
15          **a significant number of wealthy people are attached**  
16          **to the organization." What organization are you**  
17          **referring to?**

18          **A.     That's not my writing, so I don't know,**  
19          **but I'm not sure. Again, this is a draft. I have**  
20          **to see if there's other documents that show it**  
21          **coming in from -- maybe coming in from Wilson and me**  
22          **trying to fine tune it, because that doesn't sound**  
23          **like me again. I don't know who that would be.**

24



Edward Martin, Jr.

June 4, 2019

Page 359

1 (Plaintiff's Exhibits 35 - 37, previously  
2 marked, were identified for the record.)

3 BY MR. SOLVERUD

4 Q. I'm going to show you documents marked  
5 Exhibits 35, 36, and 37 from a prior deposition.  
6 And, Ed, before you get too far into these, what I  
7 want to ask you is -- so these are solicitation  
8 letters, and I don't know if you're the right person  
9 to ask or whether I need to talk to John about who  
10 the letters were directed to, how they were  
11 prepared.

12 A. Yes.

13 Q. Et cetera.

14 A. That's the easiest question of the  
15 night -- of the day. I can assure -- are you asking  
16 who they were targeted to?

17 Q. I'm going to ask -- so what I'll do is  
18 with respect to each of these --

19 A. Yes.

20 Q. With respect to Exhibits 35, 36, and 37,  
21 one would be do you know what lists were used for  
22 these documents?

23 A. That would be -- John would have the  
24 answer to that.

Edward Martin, Jr.

June 4, 2019

Page 360

1 Q. Okay. Do you know who was involved in  
2 preparing these exhibits?

3 A. As to -- 35 is not dated, but I think it  
4 must be in the summer. Is that -- do you know?

5 Q. I think that's right, but --

6 A. So as to those two, 35 and 37, I don't  
7 recognize them. I probably saw them to some extent.

8 As to November 2016, I remember seeing  
9 that. So that's -- but they would be -- so I  
10 suspect 35 and 37 are prepared by one of these mail  
11 guys that does these lengthy ones. You see the  
12 form?

13 Q. Mm-hmm.

14 A. And this one here is more of John's. This  
15 is John's writing, so, but I don't really recall to  
16 know too explicitly.

17 Q. Okay. So let me ask you with respect to  
18 Exhibit 35 --

19 A. Yes, sir.

20 Q. -- did you have any role or participation  
21 in the drafting of Exhibit 35?

22 A. I don't recognize it now, but I feel  
23 like -- it was, again, the timing is what I -- I  
24 don't recognize it, but I would think it was

Edward Martin, Jr.

June 4, 2019

Page 361

1 something I would have seen at some point, depending  
2 on the time.

3 Q. Did the board of Phyllis Schlafly's  
4 American Eagles approve sending Exhibit 35?

5 A. No. It would have been Phyllis that  
6 approved it.

7 Q. Did -- you don't know -- you don't know  
8 who the Exhibit 35 was sent to, right?

9 A. No, sir.

10 Q. Okay. And do you know anything about the  
11 funds that were raised from Exhibit 35?

12 A. No, sir.

13 Q. And do you recall whether you reviewed  
14 Exhibit 35 before it was sent?

15 A. I don't recall that. It is possible, but  
16 the timing would have been the question. These  
17 things are -- those lengthy ones are -- I just don't  
18 know. I don't remember it.

19 Q. Exhibit 36?

20 A. Yes, sir.

21 Q. Again, you don't know who this was sent  
22 to?

23 A. No, sir.

24 Q. Do you know who drafted Exhibit 36?

Edward Martin, Jr.

June 4, 2019

Page 362

1           **A.     The letter would have been John. I**  
2       **suspect I would have seen the letter, but I don't**  
3       **remember it right now, because John would draft**  
4       **that, and then I mean, it's signed by him, so it**  
5       **would have been his, but he would have sent it to me**  
6       **to take a look it.**

7           **Q.     Do you know whether -- did you play any**  
8       **role in the preparation of Exhibit 36 as president**  
9       **of Phyllis Schlafly's American Eagles?**

10          **A.     I don't recall that.**

11          **Q.     Do you know whether the board of directors**  
12       **of Phyllis Schlafly's American Eagles approved**  
13       **Exhibit 36?**

14          **A.     I don't know that, no.**

15          **Q.     Okay. Exhibit 37 --**

16          **A.     Mm-hmm.**

17          **Q.     -- is sent under your signature?**

18          **A.     Yes, sir.**

19          **Q.     Okay. This letter is dated December of**  
20       **2016?**

21          **A.     Yes, sir.**

22          **Q.     And do you know who this letter was sent**  
23       **to?**

24          **A.     No, sir.**

Edward Martin, Jr.

June 4, 2019

Page 363

1 Q. And by the way, with respect to  
2 Exhibit 36 --

3 A. Yes, sir.

4 Q. -- do you know anything about maybe funds  
5 that were received or raised as a result of a  
6 letter?

7 A. No, sir.

8 Q. That's something for --

9 A. At some point, I think I would have  
10 probably seen reports. I could have. So there  
11 might have been an exchange, you know, later, but it  
12 would have been John that was handling that.

13 Q. With respect to Exhibit 37, do you know  
14 how much money was raised by --

15 A. No, sir.

16 Q. -- as a result of this letter?

17 A. No, sir.

18 Q. And in Exhibit 37, you refer to Phyllis'  
19 letter of November 2014, correct, first line?

20 A. Oh. Yes.

21 Q. Okay. And in November of 2014, who did  
22 she send her letter to?

23 A. I don't know.

24 Q. Okay. And she refers to her Eagles. It

Edward Martin, Jr.

June 4, 2019

Page 364

1 says -- she says, "Our Eagles must fly into action,"  
2 correct?

3 **A. Yes.**

4 Q. Eagles is a reference to the members and  
5 supporters of Eagle Forum, correct?

6 **A. No, sir.**

7 Q. In November of 2014, "Eagles" was a  
8 reference to the members and supporters of Eagle  
9 Forum, correct?

10 **A. No, sir.**

11 Q. Who are you referring to when you say,  
12 "Eagle"?

13 **A. I used "Eagle" as Phyllis taught me, which**  
14 **is all of those people that are drawn to her work**  
15 **and her issues and legacy over 70-plus years.**

16 Q. You refer to "the forum of Eagles," to  
17 which you belong, as "Phyllis' enduring legacy." Do  
18 you see that?

19 **A. No. Show me where. What line?**

20 Q. It's the fourth -- fifth paragraph down.

21 **A. Yes, sir. I see it now.**

22 Q. Why did you use the words "the forum of  
23 Eagles"?

24 **A. I'm not sure I remember.**

Edward Martin, Jr.

June 4, 2019

Page 365

1 Q. That's an attempt by you to play off of  
2 Eagle Forum, correct?

3 A. No.

4 Q. No?

5 A. Well, it's an attempt for me -- I think  
6 Eagle Forum Education and Legal Defense Fund, all of  
7 these things, it was an echo of that. I don't  
8 remember seeing that, but I'm not sure.

9 Q. You say, "The forum of Eagles to which you  
10 belong is Phyllis' enduring legacy," correct?

11 A. That's what it says, yes, sir.

12 Q. And the "Eagles" is a reference to up  
13 above, "Dear fellow Eagle," right?

14 A. Yes, sir.

15 Q. And Eagle Forum referred to its members as  
16 "Eagles," correct?

17 A. Yes, sir.

18 Q. And you say, "We proudly call ourselves,  
19 quite simply, Phyllis Schlafly Eagles," right?

20 A. Yes, sir. That's what it says here, yes.

21 Q. And who is "ourselves" that you're  
22 referring to?

23 A. So this is just a month -- two months  
24 after Phyllis died, a month after the Trump victory.

Edward Martin, Jr.

June 4, 2019

Page 366

1 So there's a whole bunch of people that are  
2 energized by their relationship to Phyllis, and so  
3 I'm using the term like she did with her Eagles,  
4 referring to all the different people that were  
5 drawn to her, and that was a part of sort of  
6 bringing people together in a letter about what we  
7 were linking it to her legacy.

8 Q. But Phyllis Schlafly's Eagles was not a  
9 organization or an entity that was created as of  
10 December of 2016, correct?

11 A. Correct. It was just after that, I think.

12 Q. And you solicit donations to Eagle Trust  
13 Fund, Phyllis Schlafly's American Eagles, and  
14 EFELDF, correct?

15 A. Yes, sir.

16 Q. Did you solicit any funds for Eagle Forum?

17 A. In December of 2016?

18 Q. Yes.

19 A. I'd been -- formally been removed by the  
20 board by then, so, no. Or by the Court by then.

21 Q. The BRE, or the business reply envelope,  
22 attached is the last page of Exhibit 37, correct?

23 A. Yes, sir.

24 Q. And that is directed to Eagle Forum?



Edward Martin, Jr.

June 4, 2019

Page 367

1           **A.    Yes, sir. It says that on the --**

2           Q.    It's the same BRE envelopes that had been  
3    used in prior Eagle Forum solicitations, correct?

4           **A.    I don't know that.**

5           Q.    You don't know one way or the other?

6           **A.    I don't know one way or the other.**

7           Q.    Would it be proper to use the same BRE  
8    envelope that had been used in prior solicitations  
9    for Eagle Forum?

10                   MR. ELSTER: Object to form.

11                   THE DEPONENT: I think that would be  
12    a question that I'd rely on John to have figured  
13    out. I don't know what all that means, and I don't  
14    know whether we were trying to use envelopes that  
15    were left over. I just don't know.

16                   BY MR. SOLVERUD

17           Q.    When you were president of Eagle Forum,  
18    you were responsible for approving a budget that  
19    included payments to purchase BRE envelopes for  
20    Eagle Forum, right?

21           **A.    I'd have to review when a budget was**  
22    **passed that I approved for that. I think it was the**  
23    **board and Phyllis that approved that.**

24           Q.    Okay.

Edward Martin, Jr.

June 4, 2019

Page 368

1           **A.     So I'm not sure.**

2           Q.     So you don't know?

3           **A.     I don't know.**

4                   (Plaintiff's Exhibit 94 was marked for  
5     **identification.)**

6     **BY MR. SOLVERUD**

7           Q.     Let me show you a document marked as  
8     Exhibit 94. Tell me when you've had a chance to  
9     look at it.

10          **A.     Okay.**

11          Q.     This is a lengthy email exchange between  
12     you and John Schlafly dated November 29, 2017 that  
13     then concludes with you forwarding the emails to Ned  
14     Pfeifer?

15          **A.     Yes.**

16          Q.     You tell Ned Pfeifer, "I get calls from  
17     headhunters each week."

18          **A.     Yes.**

19          Q.     "I got tired of managing all this."

20          **A.     Yes, sir.**

21          Q.     That's a reference to managing Phyllis  
22     Schlafly's American Eagles as well as all the other  
23     activities you were engaging in, correct?

24          **A.     I'm not sure of all of the reference**

Edward Martin, Jr.

June 4, 2019

Page 369

1     **there, but it seems like it was -- the work I was**  
2     **doing, yes.**

3           Q.     Well, what was your -- what is it that you  
4     were getting tired of?

5           A.     I'm not sure to know. It just was a lot  
6     of work, a lot of things going on.

7           Q.     And you were frustrated with John Schlafly  
8     as of November of 2017, correct?

9           A.     It looks like in the email exchange, there  
10    were frustrations, but that's part of the working  
11    relationship, so.

12          Q.     Okay. On November 25th -- I'm sorry.  
13    The second to last page.

14          A.     Yep.

15          Q.     On November 25, 2017, John Schlafly tells  
16    you that he needs you to tell him "who is  
17    responsible for accounting for all the expenses of  
18    the Pennsylvania-Illinois project or whatever we're  
19    calling it." Do you see that?

20          A.     Yes.

21          Q.     And the Pennsylvania-Illinois project, can  
22    you tell us what that is?

23          A.     I believe we're referring there to the two  
24    efforts, one that Bill Hillman was involved in, and

Edward Martin, Jr.

June 4, 2019

Page 370

1 one that Mark Lloyd was involved in, in Pennsylvania  
2 and Illinois. I'm not -- yeah, I think what that's  
3 referring to.

4 Q. Okay. And he also says, "If the WC  
5 bill" -- strike that.

6 He says, "If the WCB bill was really for  
7 services they performed in 2016, then we need to  
8 have a tough conversation with them about why that  
9 amount was not included on the 2016 FEC report,  
10 which they prepared and filed." Did I read that  
11 correctly?

12 A. Hold on. Yes, sir.

13 Q. And WCB is Webster, Chamberlain & Bean,  
14 correct?

15 A. Yes, sir.

16 Q. And one of the things John is upset about  
17 is that you'd incurred debts on behalf of PS Eagle  
18 PAC using the Amex and Visa cards without telling  
19 him?

20 MR. ELSTER: Objection. Foundation.

21 THE DEPONENT: I didn't -- I don't  
22 know what the question is.

23 BY MR. SOLVERUD

24 Q. Is it true that one of the things that

Edward Martin, Jr.

June 4, 2019

Page 371

1 John was upset about is that you were incurring  
2 debts on behalf of PS Eagle PAC without telling him?

3 MR. ELSTER: Same objection.

4 THE DEPONENT: I don't see that.

5 BY MR. SOLVERUD

6 Q. Okay. At the very bottom, he says, "The  
7 whole business about reporting TPP robo calls as if  
8 they were calling the defeat of Ann Wagner and  
9 Barbara Comstock was a monumental screwup, and I  
10 resent having to pay for that mistake, which was  
11 totally necessary." What's he referring to there?

12 A. I'm not sure -- oh, TPP? The robo calls  
13 that were done by the PAC had to -- were reported by  
14 the law firm correctly -- well, reported as  
15 opposition when they could have been -- I get this  
16 backwards, but, anyway, John was unhappy with how  
17 that was reported, and how it was played in the  
18 press by your clients.

19 Q. What does TPP refer to?

20 A. The -- I think it's Trans-Pacific  
21 Partnership, the globalist agenda for trade.

22 Q. And what was the monumental screwup?

23 A. Well, that's John's characterization. You  
24 could ask him.

Edward Martin, Jr.

June 4, 2019

Page 372

1 Q. Did you understand that that was a  
2 reference to potential violations of FEC?

3 A. No, it wasn't.

4 MR. ELSTER: Objection. Speculation.

5 THE DEPONENT: But it wasn't. The  
6 lawyers who were involved in that, John was arguing  
7 that they could have handled it differently. So  
8 that was the . . .

9 BY MR. SOLVERUD

10 Q. Did you understand that John was concerned  
11 about potential FEC violations?

12 MR. ELSTER: Same objection.

13 THE DEPONENT: John Schlafly is  
14 always concerned about how we do all of our  
15 compliance. So that's -- that's a common concern  
16 and a helpful one.

17 BY MR. SOLVERUD

18 Q. On November 28th, John says, "Bill  
19 Hillman claims he had a budget of 200,000, but the  
20 estimate you showed me back in August was only about  
21 40,000." Is that true?

22 A. Is it true that John wrote that?

23 Q. No. Is it true that you told him that the  
24 estimate was -- sorry. I got a cramp.

Edward Martin, Jr.

June 4, 2019

Page 373

1 MR. ELSTER: Are you all right?

2 BY MR. SOLVERUD

3 Q. That the estimate was 40,000, but the  
4 budget that Hillman said was 200?

5 A. I don't recall that to be -- what  
6 happened, so I'm not sure what he's -- what he's  
7 talking about there.

8 Q. You tell him on November 8, 2017 that "The  
9 full plan was just over 400, but I told him we  
10 needed to see money coming in to do more than half  
11 that." Did I read that correctly?

12 A. November 8th?

13 MR. ELSTER: November 8th or 28th.

14 BY MR. SOLVERUD

15 Q. November 28th. I'm sorry.

16 A. Sorry. I was looking for November 8th.  
17 What is it? What was the question again?

18 Q. On November 28th, you say, "I'm working on  
19 repaying him from super PAC," correct?

20 A. Yes.

21 Q. And you say that "The full plan was just  
22 over \$400,000, but I told him we need to see money  
23 coming in to do more than half of that," correct?

24 A. That's what it says, yes.

Edward Martin, Jr.

June 4, 2019

Page 374

1 Q. And you say, "The mail has been good, but  
2 not nearly as sufficient." What mail are you  
3 referring to?

4 A. I don't recall.

5 Q. Who was sending out mailings, the entities  
6 you were involved in?

7 A. I don't recall. I'm not sure who that's  
8 referring to. I mean, the Phyllis Schlafly American  
9 Eagles was sending out some mailings. I don't  
10 recall if the super PAC did mail or if it's email  
11 maybe. I'm not sure what that's referring to.

12 Q. You say above -- when you say, "I sky the  
13 fastest way to settle estate is for PS American  
14 Eagles to write a check for \$10,000 to super PAC.  
15 That's allowed, and I think at least 5,000 was left  
16 there during one effort. Then you can settle the  
17 estate and can work back from super PAC to c4."  
18 What are you referring to in terms of settling the  
19 estate?

20 A. I think that -- I think that something had  
21 been paid off, the credit card, Phyllis' credit  
22 card, a long time before that either shouldn't have  
23 been or was paid out of her own personal money, and  
24 John was saying that shouldn't have been done that



Edward Martin, Jr.

June 4, 2019

Page 375

1 way. I don't remember, but I know -- pretty  
2 confident that's what it is related to.

3 Q. And did PS American Eagles or PSAE write a  
4 check to pay that off?

5 A. I don't recall.

6 Q. If you go to the email you sent on  
7 November 29, 2017 to John --

8 A. Uh-huh.

9 Q. -- it starts on the bottom of the third  
10 page.

11 A. Yes, sir.

12 Q. And you say, "Because I know you are the  
13 key man for our past and future, I've never  
14 questioned your judgment, and I don't know."

15 And then you say, "Still I am the  
16 president of PSAE. And EFELDF. And even America's  
17 Future -- America's Future, and so I've led.  
18 Preference for action in the direction of PS  
19 priorities." Did I read that correctly?

20 A. Yes, sir.

21 Q. You say, "The house file mailing did  
22 great." What are you referring to?

23 A. Where is that?

24 MR. ELSTER: Keep going.

Edward Martin, Jr.

June 4, 2019

Page 376

1 BY MR. SOLVERUD

2 Q. Third paragraph down on the next page.

3 A. I don't recall that, what time of year  
4 this is? I'm not sure I recall.

5 Q. Are you aware of a house file mailing that  
6 was done by PSAE?

7 A. I don't know specifically.

8 Q. Have you ever used the phrase "house  
9 file"?

10 A. That's kind of a political term, but that  
11 would be what I think a way to describe all of  
12 Phyllis' -- Phyllis' supporters, especially when she  
13 was alive.

14 Q. And the mailing you're referring to is a  
15 mailing that was done by PSAE?

16 A. I don't recall. I'm not sure.

17 Q. Okay. And you say, "Yes, I authorized the  
18 Pennsylvania and the Illinois projects. I told you  
19 and Ned about them and the goals. I managed them  
20 with top-notch people, and we sank Charlie Dent."  
21 Did I read that correctly?

22 A. Yes, sir.

23 Q. That's a reference to preventing Charlie  
24 Dent from being reelected?

Edward Martin, Jr.

June 4, 2019

Page 377

1           **A.     No, sir.**

2           Q.     What is that a reference to?

3           **A.     Making clear to Charlie Dent, the people**  
4 **who were pleased with him, which was a dramatic**  
5 **thing for him to see, and then he decided not to run**  
6 **for reelection.**

7           Q.     Okay. And you were opposing Charlie Dent?

8           **A.     No, sir. It was too early. There was no**  
9 **filing deadlines, and things hadn't even begun yet,**  
10 **so too early to speculate on that.**

11          Q.     Well, why are you -- why are you patting  
12 yourself on the back for sinking Charlie Dent?

13                   MR. ELSTER: Objection. Form.

14                   THE DEPONENT: I just --

15 BY MR. SOLVERUD

16          Q.     You were proud of that?

17          **A.     No. I'm not a fan of Charlie Dent's**  
18 **policies. So I'm glad that our ability to get**  
19 **people solidified around that made a difference in**  
20 **him making a judgment that he should become a CNN**  
21 **contributor.**

22          Q.     Is that something PSAE could have been  
23 involved in?

24          **A.     Highlighting the issues, the Trump issues**

Edward Martin, Jr.

June 4, 2019

Page 378

1 around what Charlie Dent and what he was saying  
2 about Trump? Sure, definitely.

3 Q. You think it was appropriate to try to  
4 prevent Charlie Dent from being elected?

5 A. Well, that isn't what happened at all.

6 Q. So that wasn't my question, sir.

7 A. What's that?

8 Q. Would it have been appropriate to engage  
9 in activities to prevent Charlie Dent from getting  
10 elected?

11 MR. ELSTER: Objection. Vague.

12 THE DEPONENT: If you -- certainly  
13 for, what, PSAE?

14 BY MR. SOLVERUD

15 Q. Yes.

16 A. I think that's right.

17 Q. Further down in your email, you say, "I  
18 strongly recommend you use the PSAE to make the  
19 estate and you whole."

20 A. Mm-hmm.

21 Q. "And then have PSAE be the issue, not the  
22 estate. That cleans up the estate, who should not  
23 have to be tied into this. Please do this." Why  
24 should PSAE be writing checks to the estate?

Edward Martin, Jr.

June 4, 2019

Page 379

1           A.    No.   The problem -- I think if I recall  
2   correctly, there was the problem with the estate.  
3   Phyllis had paid things off her credit card that  
4   shouldn't have been.   They were not something she  
5   should have incurred, and they were -- but they were  
6   the kinds of expenses that PSAE could have incurred,  
7   or the PAC, both of those.   But, again, I'm not sure  
8   of the details of that to know, but  
9   that's -- that's -- I think it was a mistaken  
10   payment by Phyllis or off the credit card that we're  
11   trying to settle out.

12           Q.    On November 29th, John Schlafly responds  
13   to you, among other things, he demands to see the  
14   publishing contracts for all books containing  
15   PS copyrighted materials since 2014.   Do you see  
16   that?

17           A.    No.   On what page?

18           Q.    The second page.   The third page.

19                   MR. ELSTER:   The third page.

20   BY MR. SOLVERUD

21           Q.    Last paragraph.

22           A.    Okay.   Yes.

23           Q.    Why was he demanding to see the publishing  
24   contracts to your knowledge?

Edward Martin, Jr.

June 4, 2019

Page 380

1           **A.     I think he wanted to see them.**

2           Q.     Did you provide them?

3           **A.     Yes, sir.**

4           Q.     And how many publishing contracts were  
5 there?

6           **A.     I'm not sure of the number.   Three or  
7 four.**

8           Q.     He says, "I never authorized any of those  
9 books to be published, and I need full documentation  
10 for each one of those books." Is that true?

11          **A.     No.**

12          Q.     Is it true that he didn't authorize those  
13 books to be published?

14          **A.     I don't know.   At least one of them,  
15 Phyllis was alive.   So she did that one.   The other  
16 ones were using her material that, I think, we could  
17 use as Eagle Forum Education and Legal Defense Fund.**

18          Q.     Which books were those?

19          **A.     The Phyllis Schlafly's speeches and the  
20 pro-life volume, the patent volume, and Phyllis on  
21 Donald Trump.   I guess there's four there.**

22          Q.     And you never had authorization from John  
23 Schlafly for those four books?

24          **A.     Well, Eagle Forum Education and Legal**

Edward Martin, Jr.

June 4, 2019

Page 381

1 Defense Fund had permission to use them,  
2 those -- that material.

3 Q. Is that in writing?

4 A. I think that Eagle Forum Education and  
5 Legal Defense Funds, we were granted  
6 by -- permission from Phyllis. I think so.

7 Q. In writing?

8 A. I think when she demanded that everybody  
9 ask permission, it was done in writing. I'm not  
10 sure.

11 Q. And specifically to use -- it's your  
12 testimony that Phyllis Schlafly provided you -- and  
13 when I say, "you," it's your testimony that Phyllis  
14 Schlafly provided EFELDF specific permission to use  
15 or to publicly the four books that you just  
16 identified?

17 A. Well, our understanding at Eagle Forum and  
18 Education Legal Defense Fund -- my understanding is  
19 that we can use her material. She gave us  
20 permission to use her material, and that was  
21 consistent with that.

22 Q. Okay. And there's a conflict here between  
23 you and John as to whether you had the appropriate  
24 authorizations?

Edward Martin, Jr.

June 4, 2019

Page 382

1           **A.     Yes.**

2           Q.     Correct?

3           **A.     Correct.**

4           Q.     And he also says, "The publication of PS  
5     copyrighted material on the Internet needs to be  
6     specifically authorized by me, and it has not been";  
7     is that true?

8           **A.     I don't recall that concern.**

9           Q.     Do you recall John Schlafly ever  
10     specifically authorizing the use of PS copyrighted  
11     material on the Internet?

12          **A.     Certainly the website we use now. I don't**  
13     **know when this was, what the issue was, but I think**  
14     **these things have been resolved. On the website,**  
15     **I'm not sure. I don't recall that continuing to be**  
16     **an issue.**

17          Q.     You respond to John Schlafly, and you say  
18     on November 29th, "I have operated under the  
19     agreement that the c3 could use all of PS  
20     intellectual property online and otherwise. It  
21     seems like we have done that for as long as we can  
22     remember." Is that true?

23          **A.     It's true that I wrote that. You're**  
24     **reading it to me, yes.**



Edward Martin, Jr.

June 4, 2019

Page 383

1 Q. And you say, "All the publishing online  
2 and otherwise has been done under that notion."

3 A. Yes, sir.

4 Q. Okay. And when you say, "For as long as  
5 we can remember," how far back are you going?

6 A. I don't know. I don't remember that I  
7 think it's -- I think it's just -- maybe it's my  
8 memory. I'm not sure. But I don't know what that  
9 would be. I don't know how long that would be.

10 Q. And so it's your position that EFELDF had  
11 the right to use PS intellectual property based on  
12 the prior practices that had been done for as long  
13 as you could remember, correct?

14 A. Well, especially after -- again, I'm now  
15 telling you here to broaden this, especially after  
16 the issues Phyllis had in the summer of 2016 when  
17 she made clear that she wanted people to ask  
18 permission to use her property and writings.

19 Q. At the bottom of Exhibit 94, it says,  
20 "Regarding PSAE, you told me in October of 2016 that  
21 PSAE could keep the small margin left over from its  
22 activities that were funded by Bill Wilson's  
23 organizations." Do you see that?

24 A. Yes, sir.

Edward Martin, Jr.

June 4, 2019

Page 384

1 Q. What activities are being referred to  
2 there?

3 A. I'm not sure, but there were a couple of  
4 things, various times that people that would have an  
5 idea that was consistent with what we wanted to do,  
6 we could work together, and sometimes they would  
7 give us some extra money to support our work. I  
8 think that's what he's referring to, but I'm not  
9 sure of the timing of that. October of 2016? I  
10 just don't know.

11 (Plaintiff's Exhibit 95 was marked for  
12 identification.)

13 BY MR. SOLVERUD

14 Q. Let me show you a document marked as  
15 Exhibit 95. Tell me when you've had a chance to  
16 look at Exhibit 95.

17 A. Yes, sir. Okay.

18 Q. Exhibit 95 is an email you sent to Bill  
19 Wilson, and you tell Bill Wilson, "Please tell all  
20 our team to stop working directly with John. Just  
21 me. It's counter productive. Just ignore him."  
22 Why did you write that?

23 A. I don't recall the specifics, but I can  
24 say it was more effective to work with me and then

Edward Martin, Jr.

June 4, 2019

Page 385

1 me to work with John than it was to have all sorts  
2 of different people talking to John with all the  
3 things that we're doing and in litigation and  
4 everything else. It got really distracting. So I  
5 think we were -- we spent a bunch of time in the  
6 first year or two after Phyllis was gone getting a  
7 rhythm on how to work well, and some of this was  
8 that at that time trying to figure it out.

9 Q. I thought you testified previously that  
10 John is who everything -- everything went through.

11 A. I did testify to that, sure.

12 Q. Okay. But now you're saying to your team  
13 ignore him?

14 A. No, that's not what I'm saying.

15 Q. Well, it says, "Just ignore him," doesn't  
16 it?

17 A. Well, it's not -- these are consultants  
18 who are in the middle of a project, and you don't  
19 have the -- it doesn't -- it's not productive to  
20 have -- to have early contact with anybody. It's  
21 better to work together to get kind of the right  
22 information, so.

23 Q. Who is your team that you're referring to?

24 A. I think the -- I think I meant your team

Edward Martin, Jr.

June 4, 2019

Page 386

1 to Bill Wilson and those guys, but I'm not sure. It  
2 looks like a typo. Maybe it's not a typo. I think  
3 it was regarding these projects.

4 Q. And this is associated with the Rockford  
5 MAGA rally; is that right?

6 A. Rockford and maybe Pennsylvania.

7 Q. So the Illinois and Pennsylvania projects?

8 A. Yeah, and that's not the term I'd use,  
9 but, yes, those ones.

10 (Plaintiff's Exhibit 96 was marked for  
11 identification.)

12 BY MR. SOLVERUD

13 Q. Okay. Let me show you a document marked  
14 Exhibit 96. Exhibit 96 appears to be your  
15 fundraising plan for 2017, correct?

16 A. I think it's a draft. I don't think  
17 this -- it was not -- this is a draft, but it didn't  
18 become the plan, but go ahead.

19 Q. And it's your draft of fundraising plans  
20 for EFELDF, PSAE, and America's Future, correct?

21 A. I think it's a -- Bill, again, sent me  
22 some ideas, and I took what he said and worked  
23 backwards and created a document, but I think this  
24 is an early version of it, and then I don't think it

Edward Martin, Jr.

June 4, 2019

Page 387

1 was on that. Yeah, definitely not.

2 Q. Under the PSAE plan, you suggested test  
3 mailing to be sent out immediately?

4 A. Yes, sir.

5 Q. You say, "Prior donors" -- "using prior  
6 donors as a separate segment"? Do you see that?

7 A. Yes, sir.

8 Q. What prior donors are you referring to?

9 A. I think we'd already been out in mail  
10 for -- I think we must have been out in the mail.  
11 I'm not sure.

12 Q. And you suggest "Renting 50,000 names for  
13 this appeal, and then add prior c4 donors to it."

14 A. Yes, sir.

15 Q. And do you know what prior c4 donors  
16 you're referring to?

17 A. I'm not sure if it was -- okay. This  
18 looks, again, like cut and paste from either Wilson  
19 or whoever was doing it, but I think it would have  
20 been -- we've already done mailings maybe? I don't  
21 know the timeline. So it could have been that. I'm  
22 just not sure.

23 Q. One of the topics that you want to or that  
24 you're planning to fundraise on is national

Edward Martin, Jr.

June 4, 2019

Page 388

1 sovereignty, correct?

2 **A. This document says that. Sure.**

3 Q. The last page it talks about steps for an  
4 integrative fundraising plan?

5 **A. Yep.**

6 Q. And it says, "Once donors have been  
7 recruited or reactivated"? What donors are you  
8 referring to that would be reactivated?

9 **A. I'm not sure I know.**

10 Q. There's a reference to a c4 prospect.  
11 What are you referring to there?

12 **A. Where is that?**

13 MR. ELSTER: Right there.

14 THE DEPONENT: I don't recall. It's  
15 a "no."

16 BY MR. SOLVERUD

17 Q. It talks about the c4 house file. What is  
18 that referring to?

19 **A. Well, that term would be the existing**  
20 **donors to the c3, I think. So that, I think, would**  
21 **be -- I'm not sure again. This is not language that**  
22 **we used. This is language from a political**  
23 **consultant, so it's a little bit off. I'm not sure.**

24 MR. SOLVERUD: Let's go off real

Edward Martin, Jr.

June 4, 2019

Page 389

1 quick. How much?

2 THE VIDEOGRAPHER: We're off the  
3 record at 6:07 p.m.

4 (Whereby a short break was taken.)

5 THE VIDEOGRAPHER: Back on the record  
6 at 6:08 p.m.

7 (Plaintiff's Exhibit 97 was marked for  
8 identification.)

9 BY MR. SOLVERUD

10 Q. Can you identify Exhibit 97 as a letter  
11 that you received on or about July 8, 2016?

12 **A. Yes, sir. I see it, and I don't -- I**  
13 **mean, it's pretty lengthy.**

14 Q. And my last question, since we're out of  
15 time, is did you ever prepare any response to  
16 Exhibit 97?

17 **A. Not that I recall.**

18 MR. SOLVERUD: Okay.

19 MR. ELSTER: We're going to read.

20 THE VIDEOGRAPHER: We're off the  
21 record at 6:09 p.m.

22

23 (Deposition ended 6:09 p.m.)

24

**Edward Martin, Jr.**

**June 4, 2019**

Page 390

1 I, EDWARD MARTIN, JR., do hereby certify:

2 That I have read the foregoing  
3 deposition;

4 That I have made such changes in form  
5 and/or substance to the within deposition as might  
6 be necessary to render the same true and correct;

7 That having made such changes  
8 thereon, I hereby subscribe my name to the  
9 deposition.

10 I declare under penalty of perjury  
11 that the foregoing is true and correct.

12  
13 Executed the \_\_\_\_\_ day of

14 \_\_\_\_\_, 20\_\_\_\_, at

15 \_\_\_\_\_.

16

17

18 \_\_\_\_\_  
EDWARD MARTIN, JR.

19

20

21

22

23

24



Edward Martin, Jr.

June 4, 2019

Page 391

1 Deponent: EDWARD MARTIN, JR.

2 In Re: EAGLE FORUM, ET AL. vs. PHYLLIS SCHLAFLY'S  
3 AMERICAN EAGLES

4 Upon reading the deposition and before subscribing  
5 thereto,  
6 the deponent indicated the following changes should  
7 be  
8 made:

9 Page Line Should read:  
10 Reason assigned for change :

11 Page Line Should read:  
12 Reason assigned for change :

13 Page Line Should read:  
14 Reason assigned for change :

15 Page Line Should read:  
16 Reason assigned for change :

17 Page Line Should read:  
18 Reason assigned for change :

19 Page Line Should read:  
20 Reason assigned for change :

21 Page Line Should read:  
22 Reason assigned for change :

23 Page Line Should read:  
24 Reason assigned for change :

Page Line Should read:  
Reason assigned for change :

Page Line Should read:  
Reason assigned for change :

Page Line Should read:  
Reason assigned for change :

Page Line Should read:  
Reason assigned for change :

**Edward Martin, Jr.**

**June 4, 2019**

Page 392

1 Deponent: EDWARD MARTIN, JR.  
2 Page Line Should read:  
Reason assigned for change :  
3  
4 Page Line Should read:  
Reason assigned for change :  
5 Page Line Should read:  
Reason assigned for change :  
6  
7 Page Line Should read:  
Reason assigned for change :  
8 Page Line Should read:  
Reason assigned for change :  
9  
10 Page Line Should read:  
Reason assigned for change :  
11 Page Line Should read:  
Reason assigned for change :  
12  
13 Page Line Should read:  
Reason assigned for change :  
14 Page Line Should read:  
Reason assigned for change :  
15  
16 Page Line Should read:  
Reason assigned for change :  
17 Page Line Should read:  
Reason assigned for change :  
18  
19 Page Line Should read:  
Reason assigned for change :  
20 Page Line Should read:  
Reason assigned for change :  
21  
22 Page Line Should read:  
Reason assigned for change :  
23 Reporter: Ann Marie Hollo  
24

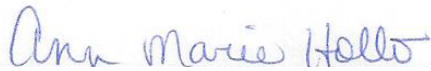
Edward Martin, Jr.

June 4, 2019

Page 393

CERTIFICATE OF REPORTER

I, Ann Marie Hollo, Certified Court  
Reporter, Registered Diplomate Reporter, and a  
Certified Realtime Reporter within and for the State  
of Missouri, do hereby certify that the witness  
whose testimony appears in the foregoing deposition  
was duly sworn by me; the testimony of said witness  
was taken by me to the best of my ability and  
thereafter reduced to typewriting under my  
direction; that I am neither counsel for, related  
to, nor employed by any of the parties to the action  
in which this deposition was taken, and further that  
I am not a relative or employee of any attorney or  
counsel employed by the parties thereto, nor  
financially or otherwise interested in the outcome  
of the action.



Certified Court Reporter  
State of Missouri

Edward Martin, Jr.

June 4, 2019

Page 394

<b>A</b>	127:4,5,8,19	334:22 368:23	181:1 182:7,12	<b>agreement</b>
<b>a.m</b> 7:4 8:17	130:8 136:2,10	378:9 383:22	182:14 185:19	48:21,22,23,24
73:17,20 98:15	136:24 139:4	384:1	313:4 346:9	49:3 121:17
98:18 130:1	259:12,14,18	<b>activity</b> 118:10	<b>affiliation</b> 235:2	210:11,22
<b>a/b</b> 32:3,13,14	260:4 312:19	156:11	<b>affiliations</b> 23:4	211:9 213:6
32:23 33:2,2	<b>accounting</b> 69:1	<b>adamant</b> 237:11	<b>afternoon</b> 5:13	253:11,14,18
<b>abandon</b> 292:20	69:2,6 369:17	<b>Adams</b> 314:11	<b>age</b> 8:15	253:22,24
<b>Abegg</b> 79:4	<b>accounts</b> 58:6,7	<b>add</b> 33:9 34:20	<b>agenda</b> 80:19	254:8,10
110:20 113:4	58:8,16,22	387:13	90:10 92:6	265:12 382:19
120:1,12	<b>accurate</b> 12:15	<b>added</b> 307:3	94:2 103:5	<b>agreements</b> 48:5
151:13 154:2	12:18 42:2	<b>additional</b>	257:21 263:21	48:12,15 67:12
<b>ability</b> 23:14,22	<b>act</b> 303:16,24	290:12 354:19	264:17 267:17	200:18
24:8 377:18	<b>acting</b> 218:6	<b>address</b> 142:15	276:11 279:15	<b>ahead</b> 23:2 60:9
393:9	221:20 225:20	172:4 248:17	279:17 280:13	100:15 101:18
<b>able</b> 67:17 70:10	229:4 230:17	302:7,11,14	311:22,24	104:5 131:24
89:5 91:5	231:2 234:10	<b>addresses</b>	317:4 318:23	131:24 167:3
111:13 112:8	237:18 238:8	219:20 304:21	321:7,8 350:11	182:1 225:8
130:11 169:10	238:10,11,17	<b>addressing</b>	354:3 371:21	257:24 259:7
225:11 227:11	239:12,13	324:3,8	<b>ago</b> 249:20	284:12 352:2
227:11 277:18	241:20,24	<b>adjust</b> 148:8	321:23	386:18
324:14	242:7,14 243:5	<b>administration</b>	<b>agree</b> 35:2,16	<b>al</b> 1:4 5:2,20 7:5
<b>absent</b> 12:3	243:9,13	196:2	36:2 42:20	391:2
109:14	252:11,18	<b>admissible</b>	43:12,14,17	<b>Alabama</b> 314:1
<b>access</b> 29:6	285:16 296:4	192:8	46:4 188:16	314:14 319:14
58:21,24 59:3	318:8	<b>admitted</b> 173:2	210:7 212:9	<b>Alan</b> 79:3
64:2 65:9,12	<b>action</b> 167:19	173:4,5,8	213:19 239:10	<b>alive</b> 21:15
127:7,13,21,22	364:1 375:18	<b>adopted</b> 300:22	239:16 243:21	30:10 49:16
292:13,16	393:12,17	311:3	244:2,6,15	52:24 53:9
353:2	<b>actions</b> 145:21	<b>advance</b> 201:5	245:6,14,24	54:2 55:24
<b>accomplish</b>	146:5	201:16 223:17	246:5 253:16	57:19 66:16
90:17 202:17	<b>active</b> 11:8	<b>advice</b> 91:2	254:3,10,11	112:20 144:15
202:19,22	314:12,17,21	130:18,21	256:5,12 265:3	147:2 148:7
350:3	314:24 318:21	276:9 284:7,7	265:14,19	171:11 178:15
<b>accomplished</b>	319:1	<b>advising</b> 276:4	266:5,16,20	180:24 181:3
286:23	<b>actively</b> 214:14	<b>advocacy</b> 201:6	267:3,10,19,24	183:5 184:23
<b>accomplishing</b>	266:21 267:4	201:17 238:20	268:3,7 273:18	237:10 256:9
267:22 268:9	315:14 324:7	239:8 248:13	284:3,4 285:11	281:19 346:8
<b>account</b> 59:4,21	<b>activists</b> 352:24	260:11	326:12 356:9	376:13 380:15
59:22,23 60:4	<b>activities</b> 70:11	<b>advocate</b> 111:14	<b>agreed</b> 8:6	<b>Allentown</b> 168:9
60:5,11,12,23	89:12 118:1	165:9 223:19	100:20 252:23	168:11
61:14,14 94:12	119:2 178:3	<b>advocating</b>	254:12 265:8,9	<b>allocate</b> 169:11
94:16,19,22,23	228:12,20	310:13 324:14	268:5,10	<b>allocation</b> 225:9
95:5,10,14,16	229:23 230:4	<b>affect</b> 201:7,18	326:19	<b>allowed</b> 55:22
95:21,21 96:3	242:3,10	<b>affiliated</b> 22:9	<b>agreeing</b> 326:15	374:15
96:6 126:23	248:21,22	179:4,8,9	326:18,22	<b>allows</b> 169:9

Edward Martin, Jr.

June 4, 2019

Page 395

<b>ally</b> 84:6	68:17,24 69:8	192:4 193:7	170:10	<b>Anne</b> 6:21
<b>Alton</b> 16:9,16	69:18 70:3,12	195:2 212:10	<b>and/or</b> 390:5	<b>announcement</b>
17:8,19 60:1	71:9,21 72:10	212:14,23	<b>Andy</b> 15:3,13,16	327:19
66:14,20	72:14,19,24	213:8,14	15:18 20:11	<b>annoy</b> 186:3,22
205:21 207:2	73:6 75:20	222:11 255:10	23:11 24:23	190:23 192:23
292:17 302:19	76:6,24 77:3,9	255:16 260:6	25:20 35:1,3	198:22
305:11,21	77:13,21 78:1	262:20 279:4,6	35:15,21 36:2	<b>annual</b> 109:14
<b>ambassador</b>	78:5,16,24	279:7,23 280:1	36:10,12,16	207:20 302:5
196:9	79:13 80:3,4	280:6,9,15	149:16 252:24	303:12
<b>ambassadorship</b>	80:10,16 84:18	281:1,6,16,21	253:11,16,22	<b>annually</b> 224:4
196:6,8	84:21 85:4,15	290:7 294:23	254:4,24	224:24 226:8
<b>amendment</b>	85:21 86:10,18	295:13,24	255:17,22	<b>answer</b> 9:11,23
299:15 300:11	87:1 88:22	296:13 298:3	256:11 269:11	10:15,19 11:21
300:14,16,21	89:17 90:2	298:11,22	269:13 271:10	12:1,4 16:20
<b>America</b> 27:12	91:19 92:3,10	299:4 300:1,18	272:24 275:18	19:13,22 20:3
92:14 214:10	92:23 93:6,15	300:20 304:7	275:19 276:12	20:6 24:16
214:12	93:23 95:10,18	304:13,19	276:17 277:2	36:5,6,8,10
<b>America's</b> 110:9	96:1 98:22	307:19 309:3,8	277:16 278:6	37:6 39:15
114:23 188:23	125:24 126:6	309:11 311:7,9	278:11 281:24	47:14 48:16
189:23 190:6	126:10 130:3,8	311:17 313:5	282:8 306:11	49:9 50:1,9
193:3,7,15	135:20 136:1	313:19 322:21	306:19 313:16	51:22 52:17
195:18,21	136:17 137:3	323:19 324:2	313:17 315:6	53:2,8,12,18
198:6 200:3,22	139:24 140:4,7	325:15 337:22	315:18,21	53:24 54:20,24
375:16,17	140:13,21	338:2,3 339:17	316:13,16,17	58:1 64:19
386:20	141:5,19,24	341:7,23 345:2	317:18 318:14	69:13 70:9,17
<b>American</b> 1:10	142:22 143:3	345:5 346:20	318:22 320:24	70:24 72:15
5:5,21 7:5 8:20	143:15 144:9	347:1,8,11	321:4,19	75:23 82:23
9:6,15 10:1	144:22 145:5	349:18 353:4	322:22 326:12	84:22 89:9
11:1,12 12:10	145:18,22	354:18 355:7	326:20 341:3	92:16 96:8
13:11 14:7,15	146:18 147:14	361:4 362:9,12	341:17,20	107:19 110:21
24:8,13 38:24	147:20 149:11	366:13 368:22	<b>Andy's</b> 23:10	111:1,3 115:12
42:7,10 43:21	150:21,24	374:8,13 375:3	25:1,4 35:16	120:19 142:7
44:2,21 46:5	151:19,22	391:2	256:5,12 273:1	144:4,4,24
46:10 47:8,16	152:4,19,24	<b>American's</b>	275:13,23	146:13 176:13
48:6,13,20	153:4,10	191:12	276:15 280:17	176:21 178:20
49:6,11,17,24	155:12 156:16	<b>Amex</b> 171:3,6,8	280:18,20,22	179:6 180:20
50:8,18 51:4	158:4,14 159:1	370:18	316:1 321:22	181:14 185:12
51:12,17 52:8	159:4 162:6	<b>amnesty/immi...</b>	322:2 326:15	186:20 190:9
52:11,19 53:4	163:22 164:22	222:12	326:19	190:15,17
53:14,20 55:1	165:1,22	<b>amount</b> 124:19	<b>angry</b> 26:7	191:2 192:15
56:8 57:2,13	166:21 167:6	193:6 260:5	<b>Ann</b> 5:16 6:23	192:16,22
57:23 58:16	167:24 168:12	335:18 370:9	7:11 8:9	198:23 199:7,9
59:9,18 61:2,5	168:15 170:7	<b>amounts</b> 143:1	129:21 130:2	215:4 219:6
65:8,11 66:4	171:15 189:11	224:7,8	371:8 392:23	246:18 253:20
66:21 67:11,19	189:16 191:10	<b>Analytic</b> 170:6	393:3	266:14 279:20

Edward Martin, Jr.

June 4, 2019

Page 396

279:21 287:5,7 289:19 305:19 324:1 325:3 347:13 350:1 355:12 359:24 <b>answered</b> 12:6 19:6 256:15 265:7 <b>answering</b> 82:16 226:10 <b>answers</b> 316:23 <b>anti-American</b> 163:24 <b>anti-Trump</b> 163:24 317:5 324:10 <b>anti-Trumper</b> 321:11 <b>anticipation</b> 221:17 <b>anybody</b> 101:9 103:21 106:13 113:7 115:7,13 124:3,5 127:7 135:15 148:17 148:22 149:10 154:24 161:4,8 179:21 197:20 220:15 228:23 241:7 253:22 257:13 258:10 262:23 268:5 311:16 312:3 320:18 349:9 349:13,15 385:20 <b>anymore</b> 63:3 200:8 340:19 <b>anytime</b> 12:24 91:4 <b>anyway</b> 281:10 285:1 371:16 <b>apart</b> 248:22 <b>apparently</b> 16:19	<b>appeal</b> 387:13 <b>appeals</b> 23:16 24:10 174:1 218:2 <b>appearance</b> 7:16 <b>appearances</b> 90:14 <b>appears</b> 15:15 20:16 96:15 386:14 393:7 <b>application</b> 88:18 <b>apply</b> 123:5 <b>applying</b> 88:22 <b>appoint</b> 339:23 340:8 <b>appointed</b> 40:16 <b>appointing</b> 337:21 338:1 341:8 <b>appreciate</b> 111:23 <b>approach</b> 255:2 255:18 256:6,8 256:13,18 269:11 <b>appropriate</b> 189:7 264:3 277:7,13 331:21 378:3,8 381:23 <b>appropriately</b> 117:16 <b>approval</b> 138:5 270:8 335:6 <b>approve</b> 49:19 144:10,13 361:4 <b>approved</b> 48:11 50:14 115:6 138:22 211:18 333:10 334:2 361:6 362:12 367:22,23 <b>approving</b>	128:14 138:11 151:13 367:18 <b>approximately</b> 140:20 152:20 174:7 200:17 269:9 <b>April</b> 252:23 253:10 254:24 257:3 269:9 277:9,22,23 278:20 282:19 283:15,22 284:13,18 295:5,18 296:4 296:7,11,16 299:9 <b>apropos</b> 326:4 <b>Archdiocese</b> 173:19 <b>areas</b> 225:8 352:8 <b>argued</b> 309:15 <b>arguing</b> 284:23 285:22 286:1 286:17,19 287:3,4,12,18 372:6 <b>argument</b> 164:14 <b>arrange</b> 135:24 <b>art</b> 32:20 113:24 114:4 217:20 <b>article</b> 204:14,15 204:19,21 205:1 209:24 210:6,7,9,13 210:16 211:22 211:24,24 212:1,2,6 300:13 <b>articles</b> 50:17 76:7 205:6 211:10 299:12 299:15 300:10 300:16	<b>articulated</b> 324:15 <b>articulation</b> 213:11 <b>arts</b> 172:24 <b>artwork</b> 115:6 <b>aside</b> 77:5 92:9 <b>asked</b> 12:5 15:11 19:5,7 20:3,5 46:20 50:5 52:9 90:5,6 91:3 107:20,21 110:20 122:20 127:21 130:2 161:24 168:20 182:5 183:9,10 183:13,14,16 183:18,21,24 184:2 188:1 213:5 221:16 236:22 255:21 256:15 258:16 258:18 265:6 299:1 320:7 322:2 325:23 344:24 358:10 <b>asking</b> 10:17 12:2 14:1 32:18 56:20 68:1 70:6,7 76:15 77:7 78:14 79:9,11 80:1 81:15,24 82:5 83:3,3,5,6 85:18 87:2 92:8,9 97:2,4 101:14 108:15 108:15 111:3 112:14 129:1,2 132:14,17 136:14 142:3 153:17 154:1,1 181:2 183:17 183:24 187:15 187:17 190:13	191:3 196:22 196:23 199:14 202:9 226:5,10 230:19 231:5 237:14,17 238:8 239:14 240:10,16 266:19 276:8 278:5 280:21 320:9 322:6 332:15,16 335:10 346:9 359:15 <b>asks</b> 225:7 <b>aspect</b> 216:9 221:21 <b>aspects</b> 188:10 276:5 <b>assert</b> 47:9 49:7 52:12 53:5,21 <b>asserting</b> 345:21 <b>assessment</b> 285:6 <b>assets</b> 268:7 <b>assigned</b> 391:7,8 391:10,11,13 391:14,16,17 391:19,20,22 391:23 392:2,4 392:5,7,8,10 392:11,13,14 392:16,17,19 392:20,22 <b>assist</b> 59:16 <b>associated</b> 95:17 95:20 121:9,13 127:19 298:2 306:23 308:22 309:16 312:20 312:22 386:4 <b>associating</b> 310:20 <b>association</b> 71:5 71:12 <b>assume</b> 33:11
---	--	--	---	--

Edward Martin, Jr.

June 4, 2019

Page 397

113:12 123:3 134:6 140:11 141:8 154:23 167:23 <b>assuming</b> 185:4 <b>assure</b> 359:15 <b>attach</b> 274:11 356:8 <b>attached</b> 4:20 212:14,16 358:15 366:22 <b>attachment</b> 76:1 166:23 <b>attachments</b> 143:8 <b>attack</b> 268:1,5 292:19 352:10 <b>attempt</b> 186:11 265:20 267:4 267:20 365:1,5 <b>attempted</b> 192:23 241:17 <b>attorney</b> 26:7 82:18 130:16 131:11 132:2 134:11,12,16 134:18 270:5 393:14 <b>attorney-client</b> 56:12 <b>attract</b> 37:15 286:13 288:7 317:9 <b>attracted</b> 37:22 311:24 317:3 <b>attributed</b> 328:8 <b>attribution</b> 159:6 <b>August</b> 341:4,16 372:20 <b>author</b> 355:3 <b>authority</b> 323:9 345:4 <b>authorization</b> 380:22	<b>authorizations</b> 381:24 <b>authorize</b> 161:4 205:4 380:12 <b>authorized</b> 48:19 135:8,10 135:12 376:17 380:8 382:6 <b>authorizing</b> 382:10 <b>Avenue</b> 6:7,11 207:5 <b>aware</b> 17:1 21:9 22:1 38:23 45:22 48:5 51:16 55:13,17 56:20,22 58:15 61:1,3,4,6,15 64:7,9,10 68:15 69:17 70:18 72:8 73:4 78:22 89:10 94:22 195:24 237:18 237:24 238:4 238:22 239:1 241:15 244:22 252:12,17 261:4,11 284:19 286:6,7 296:17,19,21 299:2,5 301:8 301:10 308:21 311:16 312:21 312:22 333:18 358:13 376:5 <b>awareness</b> 56:4 <hr/> <b>B</b> <hr/> <b>b2one</b> 142:9,10 142:18 155:11 <b>bachelor's</b> 172:24 <b>back</b> 16:12 20:9 28:2 62:5	66:18 73:19 88:23 98:17 127:9,10 134:17,18 157:17 159:8 171:22 172:13 175:2,3 176:20 177:4 188:9 189:23 194:8,9 196:4 216:3 219:9 230:14 231:1 239:11 240:1,3,17,19 241:5 255:23 264:24 266:3 266:18 274:14 285:21 293:11 321:9 327:14 329:3 346:16 372:20 374:17 377:12 383:5 389:5 <b>background</b> 37:23 186:12 192:1 <b>backing</b> 324:11 324:11 <b>backwards</b> 371:16 386:23 <b>bad</b> 108:23 <b>balance</b> 60:16 194:2 213:16 <b>bank</b> 58:6,7,8,15 58:21 59:4,21 59:22,23 60:1 60:4,11,12,17 60:23 61:14 94:12,15,18,22 94:23 95:5,10 95:13,16,21 96:2,6 126:22 127:4,5,8,18 130:2,8 136:1 136:23 139:1,4 189:1 259:12	259:14,18 260:4 312:19 <b>Banks</b> 126:18 <b>bar</b> 173:13 <b>Barbara</b> 371:9 <b>bars</b> 173:13 <b>base</b> 350:14 <b>based</b> 23:3 157:9 192:17,21 225:9 230:21 231:6,11,11 249:19 383:11 <b>basically</b> 302:23 <b>basis</b> 299:16 <b>bathroom</b> 264:19 <b>BB&amp;T</b> 58:12,13 58:21 59:1,4 59:21 60:4,11 60:16 61:14 94:15,23 95:1 95:7,9 259:18 <b>Bean</b> 116:9 370:13 <b>becoming</b> 275:10 295:23 <b>began</b> 23:1 44:2 169:1 <b>beginning</b> 41:18 62:2 88:24 282:18 315:22 <b>begun</b> 377:9 <b>behalf</b> 1:17 8:16 48:12 82:8 97:24 98:3 118:1 128:7,7 128:15 143:14 148:19 166:21 167:5 195:1 230:24 240:18 270:9 299:17 345:1 370:17 371:2 <b>behavior</b> 354:10 <b>believe</b> 26:19	59:16 61:8 71:16 74:15 82:3 84:15 95:1,14 118:8 121:5 125:22 139:7 168:16 171:15 173:10 188:22 215:15 215:16 216:4 222:22 277:6 277:21 279:17 296:9 299:21 307:1 310:17 356:18,22 369:23 <b>believed</b> 29:7 222:18 310:16 <b>belong</b> 364:17 365:10 <b>benefit</b> 93:19 <b>benefits</b> 198:9 198:12 250:20 <b>Bensman</b> 129:22 130:2 <b>BERGER</b> 6:11 <b>best</b> 35:23 56:17 111:15 119:4 141:16 147:22 148:3 162:8 181:22 182:2 182:16,22 184:18 271:15 271:20,23 272:4,10,17 276:20 277:9 277:22,24 279:8 280:1 303:17,24 393:9 <b>best-seller</b> 27:17 <b>better</b> 43:8 60:21 74:18 103:9,13 119:3 143:7 146:14 164:7 180:2
---	--	---	--	--

Edward Martin, Jr.

June 4, 2019

Page 398

188:17 247:23	259:2 260:3,13	195:21 197:23	380:10,13,18	216:15
283:20 303:1	282:19,21	204:3 205:3,9	380:23 381:15	<b>broadly</b> 28:11
354:3,5 385:21	283:4,6,15,17	211:18 220:7	<b>border</b> 223:20	33:13 35:13,21
<b>Beyond</b> 121:1	290:3,5,18,20	241:3 255:3	<b>Bott</b> 252:6,6,10	56:5 120:1
<b>bias</b> 186:10	293:22 294:19	260:17,19,21	<b>bottom</b> 15:22	242:18 326:22
<b>bicentennial</b>	294:21 295:5	260:23 261:1,5	16:1 25:8	<b>broke</b> 101:19
329:4	295:19 348:2,2	261:12,18,18	45:16 126:16	<b>brothers</b> 247:3
<b>big</b> 10:22 32:15	348:4,8 355:23	261:20,23	137:22 207:19	265:4,15,20
33:9,17 34:20	369:24 370:5,6	262:4,7,8,12	221:6 235:1	266:6,17,21
73:9 214:4	372:18 383:22	262:16,19,24	247:16 294:6	267:4,10,20
224:22 237:7	384:18,19	263:5 270:8,16	356:19 371:6	268:1,3,6,21
263:1,4 288:14	386:1,21	276:7 279:12	375:9 383:19	<b>brought</b> 280:20
289:8 315:4	<b>billed</b> 126:5	286:3 287:20	<b>Boulevard</b> 5:15	<b>Bruce</b> 15:4,13
<b>bigger</b> 86:6	140:20 292:6	287:21 288:10	6:3 7:14	15:16 23:12
<b>biggest</b> 33:8	<b>bills</b> 142:20	289:2 292:20	<b>Bowman</b> 174:1	25:21 39:22
34:3,5,9,13	153:11	293:7,10,13	<b>box</b> 207:2	40:1,14,23
<b>bill</b> 74:15,17,18	<b>bit</b> 30:3 32:19	295:7 296:11	302:15,17	41:2,3,8,21
75:3 77:23	167:11 174:19	296:12,13,17	<b>brainstorming</b>	42:5,9,13 45:2
78:2,22 79:5	175:12,14	296:22 308:10	326:4	45:2,7 46:3
79:12,19 80:2	196:12 218:9	308:12,13,14	<b>BRE</b> 219:9	187:15 252:24
80:9,18,23,24	218:10 221:3	317:12,17,18	366:21 367:2,7	253:12,17,22
81:4,7,10,13	234:1 274:6,22	317:21 318:6	367:19	254:4 255:23
81:16,19,21	275:11 285:19	321:6 324:16	<b>break</b> 26:12	269:16
82:21,24 83:7	286:19,21	329:5 331:17	73:15,18 98:16	<b>Bryan</b> 174:3,5,8
83:9,16,17,18	298:16,16	334:1 342:24	159:9 169:21	<b>buck</b> 325:24
83:19 84:2,5,8	388:23	345:11 349:17	171:18,21	<b>budget</b> 367:18
84:10,16,20	<b>Blunt</b> 100:21	349:21 361:3	230:5,10,13	367:21 372:19
85:1,5,6,19	174:21	362:11 366:20	264:23 267:20	373:4
86:22 87:2	<b>blur</b> 141:9	367:23	327:9,10,13	<b>budgeted</b> 333:22
91:13 116:6	<b>board</b> 45:3	<b>boards</b> 201:9	389:4	<b>build</b> 27:13
125:23 126:9	48:11 50:2,5	202:6 239:5	<b>Brentwood</b> 5:14	28:21,22
137:22 140:19	59:15 77:16	334:1	6:3 7:13	<b>bullet</b> 326:21
152:16 153:3	94:21 106:16	<b>bolts</b> 43:9	<b>brief</b> 50:10	350:18 351:12
154:15,19	107:12,21,22	<b>Bonhomme</b> 6:11	<b>briefly</b> 50:2	352:23,23
156:15 159:7	108:3,6,17,17	<b>bono</b> 175:10	<b>bring</b> 63:12	<b>bunch</b> 112:19
160:4 161:21	109:5,11,18	<b>book</b> 27:16	<b>bringing</b> 366:6	121:4 275:19
161:24,24	112:7 122:4,10	30:15 83:20	<b>broad</b> 78:11	316:23 366:1
162:1,2,15	135:16 136:22	89:22 100:11	157:8 178:16	385:5
163:10,11	144:10,20,23	100:11,17	193:9,12	<b>Bunny</b> 319:24
164:6,14	145:5,9,17	101:12,18,19	213:22 223:2,3	320:5,8
165:13,24	146:18,24	102:20 103:3	324:12	<b>bus</b> 157:16
167:17 168:7	147:8,20,24	104:4,6 200:6	<b>broadcast</b> 252:2	<b>business</b> 10:22
168:20 170:11	148:1,2 149:12	<b>booklet</b> 233:17	252:9 353:2	17:7 43:10
257:12 258:2	150:4,7,13	<b>books</b> 199:15	<b>broaden</b> 383:15	69:17 70:18
258:10,13,18	188:9,10 189:2	379:14 380:9	<b>broader</b> 30:9	300:5 366:21



Edward Martin, Jr.

June 4, 2019

Page 399

371:7	167:18,21	180:6,18	285:16	<b>cause</b> 5:18
<b>busy</b> 91:18	176:18 179:1	185:20 217:12	<b>captains</b> 213:18	211:15
104:7 105:23	182:8 208:24	217:15,17	<b>capture</b> 247:21	<b>causes</b> 230:20
344:5	209:7,9 218:11	233:8 243:16	<b>captures</b> 247:13	231:6,13
<b>buy</b> 160:5 249:1	223:13 224:12	291:16 297:4	247:17,19	243:11 248:13
249:3	225:18 231:11	328:5,5 333:7	<b>card</b> 168:21,22	<b>Cave</b> 174:4,5,8
<b>Buzz</b> 137:24	231:14 232:22	339:16 365:18	168:23 169:2,7	<b>CCR</b> 6:23
138:14	233:2,23	<b>called</b> 71:2	169:8,8,9,16	<b>CE</b> 75:17
<b>bylaws</b> 50:17	236:10,17,17	142:17 232:19	169:17 170:24	<b>CEI</b> 75:15
203:5,14,22,23	237:17 243:20	251:19 274:1,2	171:3,8 374:21	<b>CEI/American</b>
204:2 205:8	244:4 249:5	277:8,23 279:3	374:22 379:3	75:16
209:13,17	253:12,17,23	279:5 325:14	379:10	<b>CEL</b> 75:14
210:6 231:22	254:5,6,13	<b>calling</b> 279:2	<b>cards</b> 94:19,24	<b>CEL/American</b>
232:5 233:18	255:5,14,18	339:10,10	169:12 171:5	75:13
239:18 240:4	257:4,16	369:19 371:8	370:18	<b>cell</b> 110:4,14
262:18 274:2	258:11,22	<b>calls</b> 9:9 13:15	<b>care</b> 105:4	<b>center</b> 248:19
<b>C</b>	261:6 262:8,9	17:14 18:5	260:24	327:21 328:13
<b>C</b> 6:1	262:13 263:9	41:7 43:1,24	<b>cared</b> 54:11	329:16 330:2
<b>c-3</b> 353:1 356:22	263:10,15,15	44:24 46:13	193:18	330:13,18
<b>c-4</b> 352:24	263:18,22,23	47:12 49:14	<b>career</b> 217:1	331:16 333:1
356:21	263:23 265:10	50:22 52:22	<b>careful</b> 116:14	333:13 335:22
<b>c3</b> 10:22 23:5	270:7 271:13	53:11 54:8	116:16 117:19	343:19 344:6
27:24 29:2,14	274:5,12 276:8	55:20 56:12	157:13 165:11	<b>centers</b> 328:3,12
29:20 30:7	279:5 280:16	61:24 87:22	236:23	333:19,23
33:4 37:22	284:14 292:2,6	106:19 204:6	<b>carefully</b> 50:4	334:8,22
160:9,15,17,19	293:3 295:2,6	244:10 245:17	117:9	335:16 336:16
160:24 177:24	295:10,11,19	246:17 261:10	<b>Carlson</b> 339:5	<b>Central</b> 6:7
178:2 193:19	296:18,23	317:14 368:16	339:16,23	<b>certain</b> 5:17
218:11 224:12	307:14 311:21	371:7,12	<b>Carolina</b> 81:5	24:10 60:10
226:15 236:10	317:4 321:7	<b>calm</b> 116:9	<b>Caroline</b> 314:20	93:18 146:5
292:7,11 329:8	332:4 338:4,9	<b>calmed</b> 116:11	<b>carried</b> 244:12	158:20 164:12
331:20,21,24	338:20,21	<b>campaign</b> 80:20	<b>case</b> 1:7 5:4 7:4	173:11 174:15
382:19 388:20	353:3 374:17	89:16 118:3	7:5,6 26:17	178:3 247:13
<b>c4</b> 10:22 19:10	387:13,15	156:9 157:10	27:23 30:21,23	248:10 259:6
23:5 33:4 92:6	388:10,17	<b>campaigns</b>	31:18 72:1	349:12
92:20,22 93:5	<b>c4's</b> 236:7	230:20 231:6	112:8 118:21	<b>certainly</b> 22:12
93:18,22 106:6	<b>c4s</b> 108:12	<b>candidate</b>	190:6,20	43:16,16 71:15
108:12 130:16	263:24	112:21 156:8	200:10 240:17	89:14,19 91:14
135:3 136:15	<b>caging</b> 62:21	<b>candidates</b>	261:3	104:15 105:13
136:16,23	63:4,5,7,8,15	78:12	<b>cases</b> 174:16	108:10 112:23
137:3 156:19	63:16,20	<b>candidates'</b>	<b>categories</b>	221:2,18 228:6
156:21 157:5	<b>calculated</b> 192:7	111:15	224:10	228:24 243:18
157:10 160:22	<b>California</b>	<b>capable</b> 13:18	<b>category</b> 178:16	259:5 311:3
163:21 165:9	337:12 340:21	185:4	<b>Cathie</b> 314:11	315:3,4 317:8
	<b>call</b> 50:3 169:7,8	<b>capacity</b> 65:17	<b>caught</b> 151:3	338:19 347:5

Edward Martin, Jr.

June 4, 2019

Page 400

378:12 382:12 <b>certificate</b> 299:12 393:2 <b>Certified</b> 5:16 8:9 393:3,5,21 <b>certify</b> 390:1 393:6 <b>cetera</b> 359:13 <b>chairman</b> 108:21 109:13 144:16 147:7 175:19 224:20 260:18,24 262:3 263:5 270:11,19 296:9,10 308:19,23 <b>challenge</b> 148:6 148:8 179:19 181:11 358:12 <b>challenges</b> 147:4 181:7 <b>Chamberlain</b> 116:9 370:13 <b>Chambers</b> 319:24 320:5,8 <b>chance</b> 15:6 74:4 88:13 94:8 99:6 115:19 120:8 129:17 155:7 160:1 195:9 254:19 347:22 355:21 368:8 384:15 <b>change</b> 45:10 145:7 146:6 285:11,17 288:22 391:7,8 391:10,11,13 391:14,16,17 391:19,20,22 391:23 392:2,4 392:5,7,8,10 392:11,13,14 392:16,17,19	392:20,22 <b>changed</b> 77:10 77:11,13,16,17 77:20 95:12,12 95:18,24 96:7 146:10 204:1 207:16 <b>changeover</b> 21:4 96:2 <b>changes</b> 51:16 185:22 186:17 390:4,7 391:4 <b>changing</b> 145:11 237:7 261:7 300:17 <b>channel</b> 148:4 <b>channeling</b> 82:11 <b>chapter</b> 207:24 232:12,15,21 233:20 274:21 275:11 329:16 331:10 334:1 340:3 345:4,8 345:10 346:19 346:24 347:1 <b>chapters</b> 205:5 231:24 232:6,8 232:21 233:8 274:2 347:7,11 <b>characterizati...</b> 284:5 371:23 <b>characterize</b> 40:21 57:20 68:20 165:5 <b>characterized</b> 285:23 <b>charge</b> 56:1 85:23 109:14 115:2 169:10 210:10 <b>charged</b> 204:2 205:8 <b>Charles</b> 102:13 102:18	<b>Charlie</b> 376:20 376:23 377:3,7 377:12,17 378:1,4,9 <b>charter</b> 327:20 <b>check</b> 58:9 85:7 85:8 117:17 118:17 120:14 120:15 126:8 126:13,16 128:7 134:23 139:5 166:18 374:14 375:4 <b>checkbook</b> 166:19 <b>checks</b> 128:14 167:10 228:2 378:24 <b>Cherilyn</b> 339:5 340:8,10 341:9 341:22 <b>Chesterton</b> 29:4 29:5,21 <b>chick</b> 292:20 <b>chief</b> 174:20 <b>children</b> 40:7 87:13 <b>choose</b> 277:15 277:15 <b>Chris</b> 6:24 7:9 <b>Chuck</b> 102:16 102:18 <b>Cindy</b> 329:19 330:2 335:18 343:18 <b>circles</b> 112:18 329:23 <b>Circuit</b> 174:1 <b>circumstances</b> 241:8 278:21 <b>citizen</b> 75:18 76:1,4,8,18,19 76:21 77:1,8 77:12,20 95:17 95:21 201:5,16	257:17 258:2 258:14,19,24 259:2,13 260:3 261:7 294:22 295:11,22 300:17 302:24 312:15,21,23 <b>city</b> 174:2 201:8 202:6 <b>claim</b> 130:13 186:1 224:13 <b>claimed</b> 176:7 <b>claiming</b> 130:22 131:4,10,13 132:1,6 137:5 <b>claims</b> 191:23 372:19 <b>clarification</b> 12:3 20:5,6 <b>clarify</b> 10:18,18 11:23 12:2 57:12 129:3,3 131:2 158:16 168:17 253:15 346:14 <b>clarifying</b> 76:14 <b>clarity</b> 31:3,4 <b>Clark</b> 269:20 270:4,6,16,23 271:6,12 276:4 <b>Clayton</b> 269:21 <b>clean</b> 348:9 <b>cleans</b> 378:22 <b>clear</b> 13:8 32:14 37:6 43:4 55:22 56:1 68:23 82:7 100:3 127:1 129:7 132:24 143:23 153:13 153:22 180:24 184:24 185:1 232:20 275:3 299:2 306:6,9 354:2 377:3	383:17 <b>clearly</b> 169:5 179:17 286:24 <b>clerked</b> 173:24 <b>click</b> 250:5 <b>clients</b> 36:23 56:2 112:20 266:22 267:4 267:21 314:5 315:1,14 371:18 <b>close</b> 81:4 144:21 157:3 182:24 195:20 195:23 <b>closely</b> 226:11 <b>closer</b> 220:9 348:14 <b>cloud</b> 130:20 <b>club</b> 275:10,10 <b>clubs</b> 232:3 274:1 <b>CLVS</b> 6:24 <b>CNN</b> 377:20 <b>cobbled</b> 191:17 <b>codes</b> 96:16,20 <b>coincidence</b> 315:12 <b>coincident</b> 307:9 307:12 <b>colleague</b> 74:15 326:6 <b>colleagues</b> 120:2 <b>collected</b> 178:20 218:8 <b>collects</b> 180:4 <b>College</b> 172:20 <b>Colorado</b> 140:15 314:2 314:17 319:17 319:20 322:9 322:13 336:17 337:4,5,7 <b>Columbia</b> 173:6 173:13 205:15
---	--	--	---	--

Edward Martin, Jr.

June 4, 2019

Page 401

205:18	312:3 344:18	53:7,23 107:14	55:5,20 57:5	<b>connecting</b> 29:9
<b>column</b> 30:16	<b>communion</b>	117:2 118:4,12	61:24 106:19	<b>connection</b>
<b>combination</b>	82:1	123:8,19 146:2	107:14 109:9	78:15,23 80:9
217:18	<b>communism</b>	202:8 228:14	204:6 240:5	85:20 117:1
<b>come</b> 26:9 27:8	213:17	230:23 234:14	245:17 261:10	165:24 170:15
29:24 38:12	<b>communities</b>	266:1 276:23	262:1 263:3	238:19 239:7
71:13,17	265:23 266:9	<b>Comstock</b> 371:9	267:8 303:19	239:24 242:1,9
117:14,23	<b>company</b> 121:1	<b>Con-Con</b> 214:20	317:14 320:21	<b>Connor</b> 6:10
118:7 119:14	142:16,17,19	222:22 271:15	331:19	7:21,21
179:13 181:9	142:21	272:23 273:2	<b>conclusions</b> 17:1	<b>conservative</b>
181:10,10	<b>compensation</b>	276:20 277:10	<b>conduct</b> 145:1	11:2 12:11
215:22 293:11	98:5,6,8	278:1 280:6	219:19 330:19	42:15,22
<b>comes</b> 123:12	175:23 188:5,6	328:3 330:23	<b>conducted</b> 145:6	200:10 201:6
157:17 326:20	188:7,24	333:5	146:19,19	201:17 213:13
<b>comfort</b> 27:8	189:15 190:21	<b>concentrated</b>	147:14	265:23 266:9
<b>comfortable</b>	191:13,14,20	228:24	<b>conducting</b>	329:23
324:16	191:21 192:11	<b>concentrating</b>	289:13	<b>consider</b> 46:1
<b>coming</b> 83:20	199:13	43:9	<b>conference</b>	93:14 176:15
219:9 224:17	<b>compete</b> 13:3	<b>concentration</b>	207:20	<b>consideration</b>
358:21,21	44:8	173:1	<b>confidence</b>	262:11
373:10,23	<b>competed</b> 9:6,15	<b>concentrations</b>	305:19	<b>considered</b>
<b>command</b>	10:1 11:1,6,13	229:1	<b>confident</b> 375:2	196:6 281:18
132:22 135:2,4	12:10 13:11	<b>concept</b> 63:4	<b>confidential</b>	<b>considering</b>
<b>commentaries</b>	<b>competing</b> 12:15	68:5	186:21 198:22	90:12 285:17
193:15	12:17 44:15	<b>concern</b> 31:15	<b>confirm</b> 140:10	<b>consistent</b> 347:5
<b>commented</b>	46:6,11 47:5	39:17,21 118:8	171:16	381:21 384:5
286:11	<b>competition</b>	275:17,22	<b>conflict</b> 17:23	<b>consisting</b>
<b>comments</b>	11:10 12:20	321:5 324:10	19:16 173:1	234:24
280:17,18,20	13:19,22 42:14	324:13 372:15	381:22	<b>constantly</b> 63:1
280:22 283:7	42:21 43:7,22	382:8	<b>conflicted</b> 131:8	<b>constitution</b>
284:3	44:5 45:8,11	<b>concerned</b> 31:10	<b>confused</b> 31:1,7	327:22 328:4
<b>commission</b>	45:20,23	116:23 117:15	82:17 133:15	328:13,14,17
329:4	191:22	278:10 372:10	134:6 311:8	328:22 329:3,5
<b>common</b> 223:8	<b>competitor</b> 11:7	372:14	312:3 322:24	329:17 330:3
312:10 372:15	<b>complete</b> 94:22	<b>concerns</b> 117:24	<b>confusion</b> 232:2	330:13,19
<b>communicate</b>	<b>completely</b>	326:2	311:16,18,20	331:3,8,16
113:1 262:3	159:16	<b>concludes</b>	312:8	333:2,3,8,9,13
<b>communicating</b>	<b>compliance</b>	368:13	<b>congress</b> 201:7	333:20,23
90:18 341:20	138:6 372:15	<b>concluding</b>	<b>congressional</b>	334:9,23
<b>communication</b>	<b>complicated</b>	356:19	152:21 163:6	335:16,23
131:5	196:12	<b>conclusion</b> 9:10	202:5	336:16 338:5
<b>communicatio...</b>	<b>composed</b> 25:24	13:15 43:1,24	<b>connected</b> 31:5	338:13 343:20
56:13 130:23	<b>compound</b> 39:4	47:12 49:14	110:21 111:5	344:6
131:11 132:2	39:14 41:24	50:22 52:22	111:10 122:11	<b>constitutional</b>
148:19 242:21	47:11 52:14	53:17 54:8	178:22	214:20 328:2,6

Edward Martin, Jr.

June 4, 2019

Page 402

328:21,23 331:11 <b>constructing</b> 350:14 <b>consult</b> 72:1 78:7,9,14 80:15 103:17 149:10 150:12 290:10 <b>consultant</b> 74:19 78:2,6 79:14 79:20 80:12 81:19 91:2 139:11 161:22 162:2 283:18 354:22 388:23 <b>consultants</b> 90:20 154:12 160:23 161:10 163:17 290:6 385:17 <b>consultation</b> 87:3 147:22 <b>consulted</b> 78:20 79:21 80:13,22 85:22 86:2,22 115:13 149:6 <b>consulting</b> 78:22 79:9 81:7,9,11 81:12 85:24 115:7 120:12 121:1,3,6,8,17 122:15 124:9 139:23 140:3 140:24 150:2,6 152:17 158:24 159:3 290:6 <b>consults</b> 78:12 <b>contact</b> 101:22 102:2 124:23 251:13 270:22 299:24 339:4 385:20 <b>contacts</b> 102:8 355:1,8,10	<b>contain</b> 210:13 <b>containing</b> 379:14 <b>contemplated</b> 73:9 <b>context</b> 29:21,22 30:7 34:19 35:13 38:10 48:15 49:18,19 57:11 241:23 <b>continue</b> 37:15 260:11 293:2 <b>continued</b> 184:9 <b>continuing</b> 103:4 144:17 176:11 223:18 382:15 <b>contract</b> 121:16 122:18,18,20 <b>contractor</b> 67:19 <b>contractors</b> 67:13 68:11 <b>contracts</b> 379:14 379:24 380:4 <b>contribute</b> 100:18,24 101:8 198:8 <b>contribution</b> 125:3 358:7 <b>contributions</b> 60:7 101:16 125:9 226:12 231:10 <b>contributor</b> 377:21 <b>contributors</b> 125:4 <b>control</b> 39:11 54:18 127:18 223:20 258:14 <b>controlled</b> 85:6 136:10 <b>controls</b> 54:15 58:21 127:5	<b>convene</b> 261:18 262:6,17 <b>convened</b> 261:22 262:19 <b>convenient</b> 60:13 <b>convention</b> 214:20 271:16 276:21 277:10 278:2 280:10 281:2 328:6,21 328:23 331:11 <b>conversation</b> 24:3 30:7 198:1 255:22 256:1 286:14 286:22 297:9 315:10 326:7 370:8 <b>conversations</b> 19:15 149:15 178:12 198:3 241:6 246:14 247:2 277:2 282:8,9 285:4 <b>converted</b> 76:5 77:8,10 <b>convey</b> 287:12 <b>coordinating</b> 97:16,19 <b>copied</b> 15:19,21 16:1,3,3 79:7 256:21 257:1 269:15 <b>copies</b> 23:12 100:13 101:13 <b>copy</b> 30:15 120:15 203:23 343:12 <b>copyrighted</b> 379:15 382:5 382:10 <b>Core</b> 223:8 <b>Cori</b> 6:21 31:9 45:9 46:4	185:2 <b>corporate</b> 145:23 <b>corporation</b> 298:20 299:17 <b>corporations</b> 334:11 <b>correct</b> 8:21 9:16 10:5 11:3 14:8 15:23 16:2,10,16 20:7 28:10,11 30:5 32:10 33:22 34:10,22 34:23 39:23 40:3 41:5 42:7 42:11,12 47:2 49:24 50:8 51:13 58:5 60:24 61:10,11 75:13 76:24 77:14,21 79:1 82:12 84:9,14 85:16 88:16 90:4,19 95:19 110:15 112:12 113:22 114:2 120:13 121:11 121:17,21 122:4,5,6,7,16 126:21 129:23 129:24 130:6 130:14 135:21 136:2,6,10,17 137:5 138:8 140:22 143:15 148:14 150:8 150:21 151:20 152:21 155:13 158:1,2,4 166:24 170:11 171:1 173:14 174:22 176:9 178:8 182:13 182:15,23	183:1 184:10 185:5 187:4,16 188:2,13 189:1 189:12,17 191:3 195:15 195:18 202:15 202:17,24 203:3,6,14,22 204:4 205:10 205:15,22 209:14 210:18 211:11,16,17 211:19,20,23 212:4 214:1,7 214:10,15,20 215:13 216:10 218:17 219:5,6 219:20,21 220:4,12,19 221:11,12,14 222:2,9,23 223:1 224:5 229:7,23 230:4 231:20 236:4 238:21 239:10 241:22 242:3 242:11,16,22 243:3,7,11,12 243:16,17,23 247:8 248:14 248:23,24 249:3,14 250:21 251:22 256:22 257:9 257:12,17 258:3,14,20 259:1,3,13 260:6 262:17 262:18,21 263:24 264:4 264:13,15 268:18,22 269:12,16,22 273:3,7,22 276:12,15
---	---	---	---	---

Edward Martin, Jr.

June 4, 2019

Page 403

278:19,24	342:22 343:11	<b>count</b> 57:17	345:7,11 346:3	<b>currently</b> 51:6,8
279:4,9 281:16	345:5 353:9	97:12	366:9 386:23	65:9,12 172:2
282:24 283:5	354:1,19 355:1	<b>counter</b> 384:21	<b>creating</b> 41:11	173:12 179:12
283:16,23	357:17 363:19	<b>counties</b> 201:8	263:23	181:12 185:16
284:15 285:18	364:2,5,9	<b>country</b> 26:23	<b>creation</b> 9:5,14	<b>custom</b> 108:20
286:18 288:3	365:2,10,16	44:6 112:1	9:24 10:24	<b>customer</b> 299:24
288:11,20	366:10,11,14	207:23 223:18	13:12 51:18	<b>cut</b> 387:18
289:13 290:3,8	366:22 367:3	227:23 233:21	63:24 77:24	<b>cycle</b> 125:9
290:13,16	368:23 369:8	<b>couple</b> 58:10	78:5,15,23	144:21 222:5,8
291:3,6,10,13	370:14 373:19	100:13,18	79:13 80:3,10	
291:17,24	373:23 382:2,3	129:21 384:3	85:20 86:17,24	<b>D</b>
292:11,14,17	383:13 386:15	<b>course</b> 31:11	90:2 105:11,15	<b>D'Agostino</b>
294:19,24	386:20 388:1	61:19 108:11	105:21 108:7	345:3 346:19
295:3,14,24	390:6,11	194:21 280:7	108:18 145:24	346:22
296:5,8,14	<b>corrected</b> 154:8	308:1	248:4 262:20	<b>D.C</b> 173:11
297:2 298:3,12	<b>correctly</b> 17:9	<b>court</b> 1:1 5:1,16	290:7 296:3	207:22 292:14
298:23 299:13	17:10 23:16	5:19 6:23 7:7	298:2,5 309:2	<b>Dan</b> 7:19
299:18,20	26:18 43:10	7:10,10,12 8:3	327:20	<b>Daniel</b> 6:18
300:2,19,22	46:7 116:20	8:10 26:17	<b>credit</b> 168:21,23	<b>database</b> 65:2,6
302:8 303:3,4	117:9 130:5	30:21,22 31:17	169:2,7,8,8,9	<b>date</b> 7:3 8:23 9:3
303:6,14,17	223:23 255:6	132:9 133:14	169:12,16,17	9:4 21:23
304:1,4,7,10	257:6 271:18	133:24 134:8	170:23 374:21	24:15 96:13
304:13,16,19	292:8,22	173:24 176:24	374:21 379:3	176:15 201:2
305:12,14,15	293:17 323:22	183:6 366:20	379:10	220:23
305:18 306:12	324:5 326:13	393:3,21	<b>critically</b> 23:15	<b>dated</b> 88:16
306:15 310:10	338:7 341:10	<b>courts</b> 137:6	24:9	99:13,17 100:9
310:14,21	348:7 370:11	<b>cover</b> 135:1	<b>Cross</b> 172:19,20	104:1 140:21
312:13,14,16	371:14 373:11	139:1 334:19	319:3	148:14 152:18
312:23 313:3,6	375:19 376:21	<b>coverage</b> 195:14	<b>CRR</b> 6:23	155:15 157:22
313:20 314:6	379:2	<b>craft</b> 348:9	<b>Crumley</b> 141:14	157:24 257:3
314:12,15,18	<b>correspondence</b>	<b>cramp</b> 372:24	141:15,18,20	341:15 360:3
314:21,24	242:21 312:6	<b>crap</b> 293:7	141:23 142:15	362:19 368:12
316:2,6 318:9	<b>cost</b> 138:2	<b>crapper</b> 112:2	142:23 143:2,4	<b>dates</b> 176:16
318:10,12,18	<b>costs</b> 335:5	<b>create</b> 22:2 29:2	143:14,17,24	<b>Dave</b> 285:10
318:22 319:2	<b>Council</b> 207:20	50:18 62:3	144:14 155:11	<b>David</b> 289:12
319:12,15,22	243:6 271:17	253:12,23	282:22 283:5,8	<b>day</b> 5:11,13
321:20,24	276:22 277:11	254:5 276:19	283:9,10,13,17	37:20,20 104:8
322:4,10,14,18	278:3 281:7,9	296:18 336:15	290:13 291:1	347:4,4 359:15
322:22 323:1	281:18,22	<b>created</b> 8:21	293:22 294:2	390:13
323:14 324:9	<b>councils</b> 202:6	21:6 29:4 41:5	<b>Crumley's</b>	<b>day-to-day</b>
325:8 328:6	<b>counsel</b> 8:7,7	64:8 146:4,9	283:24 284:3,4	144:18
330:16 331:11	56:14 130:18	146:10,12	<b>Cruz</b> 31:11	<b>days</b> 100:12
332:1,4 338:10	133:12 270:9	217:2 222:16	<b>current</b> 60:16	149:3 194:3
338:14,18,24	393:11,15	254:6 312:12	123:21 198:19	341:16,19
341:4,17,24	<b>Counselors</b> 7:15	313:2 334:6	230:21 231:6	<b>DC</b> 207:5

Edward Martin, Jr.

June 4, 2019

Page 404

<b>dead</b> 46:17	160:20 176:2	<b>demands</b> 197:12	50:23 52:15,23	289:18 303:20
<b>deadlines</b> 377:9	188:23 193:20	197:17,21	53:8,18,24	310:24 311:13
<b>dealing</b> 83:9,9	200:4 222:18	255:3 379:13	54:10,19 55:6	315:9,17
83:15	223:20 226:16	<b>demarcated</b>	55:21 56:15,22	317:15 320:22
<b>dealings</b> 69:17	236:21 237:11	169:6	57:6 62:1,17	321:3 323:6,16
70:18 82:21	237:15 245:21	<b>demonstrate</b>	74:9,11 75:24	327:9 331:20
83:6	273:9 275:2	191:5 210:21	87:23 88:5	367:11 370:21
<b>Dear</b> 365:13	310:16 312:10	211:8	93:2,7 97:20	371:4 372:5,13
<b>death</b> 147:11	329:8 330:9	<b>demonstrates</b>	104:15 106:20	377:14 378:12
306:7	334:17 336:9	55:10	107:15 109:10	388:14 391:1,4
<b>debate</b> 357:4	344:19,23	<b>Dent</b> 162:22	116:13 117:3	392:1
<b>debts</b> 370:17	346:13 351:1	163:7 165:3	118:5,14	<b>deposes</b> 8:16
371:2	365:6 380:17	353:11,24	121:14 123:9	<b>deposited</b> 60:5
<b>decades</b> 66:18	381:1,5,18	376:20,24	123:21 126:2	60:11
79:22 81:19	<b>defer</b> 34:7	377:3,7,12	132:8 133:6,23	<b>deposition</b> 1:15
84:3 218:14	178:14	378:1,4,9	137:20 144:3	5:9 7:2,12 8:8
273:5	<b>define</b> 176:10	<b>Dent's</b> 377:17	146:3 149:1	8:17 14:14
<b>December</b> 26:17	178:13	<b>depend</b> 24:9	150:10 153:7	74:1 82:12
30:21 33:8	<b>defined</b> 178:11	<b>depended</b> 85:3	157:19 159:13	88:12 132:17
39:9 42:13	179:17 209:11	215:11 232:11	159:15,19	153:24 192:13
43:20 44:19	209:13	232:14,23	166:3,7 167:7	235:16 337:20
286:11 362:19	<b>definitely</b>	<b>dependent</b>	178:5 184:14	347:21 359:5
366:10,17	352:12 378:2	215:17,18	184:22 185:7	389:23 390:3,5
<b>decide</b> 22:12	387:1	<b>depending</b> 361:1	185:12 194:8	390:9 391:3
309:7	<b>definition</b> 32:6	<b>depends</b> 23:14	201:21 202:9	393:7,13
<b>decided</b> 89:23	91:21,24	157:7 212:13	203:17 204:7	<b>describe</b> 13:20
377:5	<b>definitional</b>	<b>deployment</b>	208:14 209:21	44:15 70:14
<b>deciding</b> 132:22	93:20	352:5	219:5 223:4	73:11 141:17
<b>decision</b> 108:22	<b>definitively</b> 54:1	<b>deponent</b> 8:5	226:22 228:16	157:9 162:8
132:20 296:18	<b>degree</b> 172:16	9:12,18 10:12	229:19 230:7	179:7,15 220:5
296:23	172:23	11:6,17 12:7	230:24 231:9	272:16 376:11
<b>decisions</b> 54:12	<b>degrees</b> 234:21	12:14 13:7,16	232:2 233:16	<b>described</b>
109:15	<b>delayed</b> 104:5	16:21 17:16	234:15 236:6	179:10 182:21
<b>Decker</b> 200:11	<b>delegation</b> 163:6	18:7,19 19:7	242:6,12 244:2	183:2,15,19
<b>declare</b> 390:10	<b>delegitimize</b>	20:18 21:14	244:11,21	210:8 213:7
<b>defeat</b> 271:15	265:20 266:6	22:6,16,18,24	245:12,18	218:10 223:13
272:23 276:20	<b>deleted</b> 303:1	24:1 26:10	246:3,9,22	273:23
277:10 278:1	<b>deliberative</b>	35:20 36:18	253:4 256:16	<b>describing</b> 89:19
280:6 328:5	117:10 326:1	37:13 38:8	259:22 260:9	132:13 210:10
371:8	<b>delineated</b>	39:5,15 40:11	261:11 262:2	255:17 332:14
<b>Defendant</b> 6:10	232:14 233:22	40:20 41:8	263:4 264:7	<b>description</b> 33:2
7:18,22	<b>Demand</b> 163:23	42:1 43:2,14	265:8 266:2,11	62:2 121:8
<b>Defendants</b> 1:13	<b>demand</b> 381:8	44:1 45:1	267:1,9 269:4	155:16,24
5:7,21 8:8	<b>demanding</b>	46:15,20 47:4	272:3 277:1,14	178:15 197:1,2
<b>defense</b> 69:10,19	379:23	47:13,19 49:15	278:4 287:9	201:22 213:21

Edward Martin, Jr.

June 4, 2019

Page 405

213:22 236:11 236:22,23 237:1 324:12 326:3 332:18 <b>design</b> 62:5 170:7,16 332:13,17,18 332:19 <b>designed</b> 332:8 332:21 <b>designing</b> 332:9 332:22 <b>desire</b> 65:24 78:7 80:19 87:4 <b>desires</b> 193:17 <b>desk</b> 110:11 <b>destroy</b> 293:10 293:13 <b>details</b> 31:21 165:21 216:3 326:23 330:6 379:8 <b>determine</b> 72:1 322:20 <b>develop</b> 22:8 357:11 <b>developed</b> 217:1 225:6 245:7 <b>Development</b> 221:7,10 <b>died</b> 27:3 28:21 28:22 29:4 49:21 54:11 56:3 104:12 106:22 365:24 <b>dies</b> 29:22 <b>difference</b> 42:16 42:23 44:20 45:4 321:4 377:19 <b>differences</b> 311:8 312:4 <b>different</b> 14:4 27:19 30:11	59:12 60:14 62:12 73:8 84:11 89:21,23 101:2 106:1 108:11 123:13 129:21 162:3 165:19,20 171:4 179:14 193:10 207:14 208:10 217:7,9 224:10 225:4,7 225:8 230:20 231:5 237:8 240:5 242:2,10 245:2 250:3 275:11 285:24 323:10 326:7 327:1 332:15 333:5 340:10 340:13 354:7 366:4 385:2 <b>differently</b> 18:10 208:5 216:11 234:15 372:7 <b>difficult</b> 158:17 209:3 <b>Diplomate</b> 393:4 <b>direct</b> 8:18 89:16 90:4 216:8,14,20 217:6,7,19 218:1,20 221:10,18,21 225:13 350:5,7 <b>directed</b> 125:23 139:24 152:18 153:3 155:12 158:3,24 170:6 350:12 359:10 366:24 <b>direction</b> 27:7 147:3,6 347:4 348:10 349:5 375:18 393:11	<b>directly</b> 110:11 111:14 142:20 334:21 343:6 384:20 <b>director</b> 42:10 65:16 81:5 173:18 296:8 296:10 303:9 304:3,6,10,12 304:16,18 306:11,14 318:11,14,17 335:4 336:4,20 341:6 344:18 <b>directors</b> 48:11 48:19 106:17 107:12,21 108:3,6,17 109:5,18 136:22 144:10 145:5,9,17 146:18 147:1 147:21 149:12 204:3 205:3,9 211:18 260:17 261:5 265:21 266:7 267:5 295:7 296:18 296:22 301:1,3 302:21,23 303:5 306:23 306:24 307:2,6 307:10 308:13 308:20 331:17 334:21 336:1 342:17 362:11 <b>disagree</b> 36:2 45:1,3 <b>disagreement</b> 197:16,20 <b>disappointed</b> 284:6 <b>disclose</b> 107:11 108:2 136:21 260:16,19	270:15 <b>disclosed</b> 131:5 137:8 260:23 261:15 262:22 <b>disclosing</b> 131:7 <b>disclosure</b> 108:6 108:16 109:17 261:4 296:17 296:21 <b>disclosures</b> 108:20 109:4 148:16,21 <b>discovery</b> 192:8 <b>discuss</b> 90:1 106:12 107:10 241:11 261:23 297:7 <b>discussed</b> 89:14 89:15 241:8 356:24 <b>discussing</b> 187:23 188:10 287:13 288:10 <b>discussion</b> 21:19 22:10 23:4 27:10 96:22 105:6 135:9 189:2 196:18 204:17 232:5 239:21 240:9 240:10 267:12 286:2,12 288:6 288:23 305:3 309:13 311:1,3 311:4 342:4 354:11 <b>discussions</b> 21:1 22:7,21 23:2 42:6 86:6 103:20 196:23 225:13 246:14 246:17 287:11 330:1 <b>dispute</b> 243:1 <b>distinct</b> 249:5	<b>distinction</b> 218:3 <b>distinguish</b> 191:15 216:22 218:21 <b>distinguishing</b> 216:19 218:15 <b>distracting</b> 385:4 <b>distribute</b> 100:14 <b>District</b> 1:1,2 5:1,1,18,19 7:7 7:8 152:21 173:6,13 205:15,18 <b>districts</b> 351:13 351:21 <b>divert</b> 265:15 <b>doc</b> 220:24 221:2 <b>doctor</b> 40:3 45:2 <b>document</b> 14:21 16:18 20:16 25:15 35:7 38:19 73:24 88:11 91:18 92:9 94:7 99:4 113:18 115:18 119:22 120:7 129:16 137:12 139:18 141:13 142:13,13 148:12 152:11 152:16 155:4 159:24 161:18 166:12 169:21 170:2 187:2 195:8 206:13 207:12 220:2 221:14 222:16 232:3 254:18 268:17 282:13 289:23 294:11 297:11,15,21
---	--	--	---	--



Edward Martin, Jr.

June 4, 2019

Page 406

300:6 301:11	204:17 225:6	61:19 62:3,10	102:2,8,11	107:12 108:7
301:18 302:20	232:23 234:23	64:14,15,18,20	<b>dues</b> 178:21	108:16,18
310:5 313:11	236:2,2,12,17	64:22 65:3,9	179:20 180:4,7	109:5,19 113:2
321:15 327:6	236:18,18	65:12 101:2	210:17 211:3	121:10 122:1,9
327:17 337:19	260:12 270:21	219:16 224:4	211:14 215:5,9	122:12,16
342:13 347:20	276:1 279:13	224:24 225:21	215:12,17	123:5,12,21
349:8,9 352:16	280:16 286:16	226:8 227:13	216:5	124:2,6,24
354:22 355:3,4	289:12 319:23	227:21 228:9	<b>duly</b> 393:8	125:5,18 126:6
356:7,8,12	320:1 322:22	244:8 292:2	<b>dumb</b> 92:20	126:9,14,24
368:7 384:14	331:6 332:19	356:23 387:5,6	<b>duties</b> 192:6	127:2,16,20
386:13,23	341:10 348:11	387:8,13,15	266:23 270:10	128:1,4,9,10
388:2	356:15 369:2	388:6,7,20	<b>duty</b> 303:24	128:12,15
<b>documentation</b>	385:3 387:19	<b>Dooling</b> 337:9	<b>Dye</b> 79:3	130:14,23
380:9	<b>dollar</b> 356:24	<b>door</b> 98:13		131:12 132:3
<b>documents</b>	357:1,13,24	224:18	<b>E</b>	135:2 136:22
16:22 28:3	358:3	<b>doubt</b> 105:19	<b>E</b> 6:1,1 126:17	137:5,9,24
33:12 50:24	<b>dollars</b> 100:19	<b>draft</b> 143:13	<b>Eager</b> 339:5	138:17,19
51:23 52:2	100:24 101:9	151:18,21	340:8 341:9,23	148:19 149:2
55:15 56:9,13	102:19 125:1	203:23 220:6,7	<b>Eagle</b> 1:4 5:2,20	149:11,11
56:19,20 67:23	217:2 224:3	220:9,11,20	6:6 7:4,23 9:6	151:22 160:8
73:13 76:19	<b>domain</b> 160:5	221:16 223:10	9:15 10:1 11:2	160:11,18,19
77:2,5 113:12	<b>dominant</b>	311:1 327:19	11:6,7,13	169:7 172:8
113:13 118:16	147:11	333:15 343:8	12:10 13:10	175:16,23,24
124:20 158:21	<b>Donald</b> 213:1,4	343:13 346:5	16:9,15 17:7	176:1,1,4,8,16
159:12 273:24	276:14 380:21	348:14 350:8	17:19,23 18:3	176:18 177:8
298:1 301:15	<b>donate</b> 125:15	353:22 355:5	19:10,16 22:3	177:20 179:5
302:16 303:11	<b>donation</b> 226:18	358:19 362:3	22:22 26:2	182:3,7,12,14
358:20 359:4	<b>donations</b> 9:16	386:16,17,19	33:16,20,21,23	182:17 183:1,4
359:22	9:20 63:8,13	<b>drafted</b> 361:24	36:19 38:24	183:6 184:5,7
<b>dodge</b> 26:11	218:17 219:1	<b>drafting</b> 360:21	39:11 43:22	184:17 185:20
<b>dog</b> 352:10	224:4,10,18,24	<b>drag</b> 268:8	44:7,21,21	188:22 191:19
<b>doing</b> 29:11,23	225:21 226:2,8	<b>dramatic</b> 284:9	45:7,11,12,19	192:5 193:19
30:17,19 33:5	227:13,17,18	285:19 286:19	45:20,23,23	200:3,24 201:4
37:9 44:3,12	227:20,23	286:21 377:4	46:11 47:10	201:15 202:3
80:14 92:1	228:3,6,23	<b>dramatically</b>	48:19 49:8,11	202:16,18,21
97:14 102:19	229:13,21	287:5	52:13,20 53:6	203:1,4,14
103:6 104:17	230:2,20 231:5	<b>draw</b> 37:7	53:15,22 62:4	204:3 205:3,4
105:2 108:13	231:19 243:14	<b>drawn</b> 286:23	65:5 69:9,10	205:5,5,9,10
109:20 112:6	243:19 265:16	364:14 366:5	69:19 70:19	205:13,14,16
118:16,18	366:12	<b>Drive</b> 172:5	72:10 84:9,13	205:19,20,23
135:2,16	<b>donor</b> 125:18	<b>drop</b> 23:13 63:2	99:24 100:1,2	205:24 206:4,7
138:21 159:8	138:3,23 291:9	163:23	100:7 103:1	206:9,21,23,24
191:11,15,18	357:9	<b>drove</b> 170:19	105:16,21	207:20,23
193:10 194:19	<b>donors</b> 9:7,22	<b>Drury</b> 101:2,5	106:5,12,13,16	208:8,8,10,21
195:24 198:4	38:23 57:15	101:10,22	106:16 107:11	208:22 209:5



Edward Martin, Jr.

June 4, 2019

Page 407

209:16 210:5	243:6,10,10,14	311:17 312:5,9	56:8 57:3,14	167:24 168:12
210:17 211:21	243:18,20,22	312:9 317:12	57:23 58:17	168:15 170:7
212:10,23	244:4,6,7,15	317:24 318:8	59:9,19 61:2,5	171:16 178:16
213:13,24	245:6,14,20,21	318:12,15,18	65:8,11 66:4	181:10 189:12
214:6,9,14,19	245:22,24	318:20 319:11	66:21 67:11,19	189:16 191:10
214:22,23	246:5,15 247:4	319:13,14,17	68:17 69:8,18	192:4 193:7
215:5,10,11,16	247:6,14 248:4	319:21 320:15	70:3,12 71:2,8	195:2 209:3
216:2,9 217:13	248:5,6,12,12	321:6 322:3,13	71:10,11,21,22	237:9 242:23
218:6,7,11,11	248:20 249:2,5	322:17,22	72:6,10,14,19	243:15 255:10
218:15,24	249:10,17	323:12 324:7	72:24 73:6	255:16 260:6
220:4 221:21	250:6,17,20	329:7,16 330:9	75:13,16,20	262:20 275:9
222:24 223:6	251:8,10,21,21	331:9,17	76:6,24 77:4,9	279:4,6,8,23
223:18,22	252:1,12,13,19	334:17 336:9	77:14,21 78:1	280:1,6,9,15
224:2,2,11,14	252:20 253:1,7	338:3 344:18	78:5,16,24	281:2,6,16,22
224:18,23	254:13 260:17	344:22 346:12	79:13 80:3,4	290:7 294:24
225:17,20	261:5 262:8,13	348:17,20	80:11,17 84:18	295:13,24
226:5,7,15,16	262:24 263:9	351:1,3,4,14	84:21 85:4,21	296:13 298:3
227:10,10,12	263:15 265:5	351:18 352:9	86:10,18 87:1	298:23 299:4
227:19,20	265:16,22	352:14,17	88:22 89:17	300:1,20 304:7
228:1,2,3,11	266:8,23 267:6	355:10 357:12	90:3 91:19	304:13,19
228:19 229:3	267:21 268:1,8	357:22 364:5,8	92:3,10,24	307:19 309:3,8
229:12,17,22	268:9 270:7,9	364:12,13	93:6,15,23	309:11 311:7,9
229:22 230:2,3	270:17 271:12	365:2,6,13,15	95:10,19 96:1	311:17 313:5
230:8,17,18	271:17 273:2,6	366:12,16,24	98:22 125:24	313:20 322:21
231:3,4,11,11	273:9,11,21	367:3,9,17,20	126:10 130:3,8	323:20 324:3
231:14,16,18	274:4 275:1,1	370:17 371:2	135:20 136:1	325:15 333:6
231:23,23	276:19,22	380:17,24	136:17 137:3	337:22 338:3
232:8,9,17,22	277:11,22	381:4,17 391:2	139:24 140:4,7	339:18 341:7
233:1,2,5,10	278:2 281:7,9	<b>eagleforum.org</b>	140:13,21	341:23 345:2,5
233:18,23	281:17,22	248:15,21	141:5,19,24	346:20 347:2,8
234:3,6,10,22	282:24 283:14	<b>Eagles</b> 1:11 5:6	142:22 143:3	347:11 348:22
234:23 235:5	284:14 285:7	5:21 7:5 8:21	143:15 144:9	349:2,18 353:4
235:10,20	285:16,17	9:6,15 10:1	144:22 145:5	354:18,24
236:2,3,8,18	288:2,11,18	11:1,13 12:10	145:18,22	355:7 361:4
236:20,20,21	292:11 296:5,8	13:11 14:8,16	146:18 147:15	362:9,12
237:2,3,4,10	296:14,17,22	24:13 39:1	147:20 150:21	363:24 364:1,4
237:14,17,19	298:11,23,24	42:7,10 43:21	150:24 151:19	364:7,16,23
237:20,24	300:18 302:11	44:2 46:5,10	152:4,19,24	365:9,12,16,19
238:11,18,18	302:14 303:13	47:8,16 48:6	153:4,10	366:3,8,13
239:7,9,13,20	303:17,24	48:13,20 49:7	155:13 156:16	368:22 374:9
239:21 240:1	304:3,10,16	49:11,17,24	158:4,14 159:1	374:14 375:3
240:18 241:9	306:14 307:11	50:8,18 51:4	159:4 162:6	391:2
241:21 242:1,1	309:17,21,22	51:12,17 52:8	163:22 164:22	<b>Eagles'</b> 24:8
242:8,9,15,15	310:9,10,14,15	52:12,19 53:4	165:1,22	69:1 85:15
242:20 243:2,6	310:15 311:9	53:14,20 55:1	166:21 167:6	<b>earlier</b> 14:3

Edward Martin, Jr.

June 4, 2019

Page 408

28:22 100:15	160:20 176:2	383:10 386:20	144:5,21 149:3	148:24 150:9
171:4 181:8	188:22 193:20	<b>effective</b> 185:14	156:13 157:3	153:6 155:18
232:3 256:3	200:4 226:16	216:13 219:14	158:18 162:22	157:18 159:9
259:17 269:11	234:12 236:20	286:5 384:24	163:8 165:2	159:14 169:22
270:18 273:23	237:10,15	<b>effort</b> 38:23	222:1,15	178:4 184:12
274:23 280:11	245:21 250:13	97:21 114:7	257:22 286:10	184:20 185:6
281:12 302:16	273:9 275:1	124:12 162:21	325:1	185:11,24
310:20 345:14	310:16 312:9	212:16 263:11	<b>elections</b> 165:10	186:7,13,19
<b>early</b> 27:18	329:7 330:9	315:22 338:20	<b>else's</b> 325:6	189:24 190:4
28:19 138:1	333:8 334:17	343:22,22	<b>Elster</b> 6:14,14	190:10,14,18
163:19 175:19	336:9 344:19	374:16	7:17,17 9:8,17	191:3,21 192:2
175:21 187:8	344:22 346:13	<b>efforts</b> 40:16	10:3,11 11:4	192:9,19,21
243:22 285:14	351:1 365:6	70:16 86:7,9	11:15 12:5,12	194:13 198:21
349:8 353:22	380:17,24	162:4 213:7	13:5,14 14:23	199:4,9,12,18
354:7 377:8,10	381:4,18	215:24 238:20	16:17 17:14	201:20 202:8
385:20 386:24	<b>educational</b>	239:8 242:2,9	18:5,18 19:5	203:11,15
<b>earn</b> 200:9	92:20 93:15,18	248:13 344:6	20:15 21:12	204:5 208:13
<b>earned</b> 63:23	93:24	369:24	22:4,15,17,23	209:19 219:3
172:16 244:7	<b>Edward</b> 1:16 5:9	<b>eight</b> 5:11 205:6	23:24 26:9	223:2 226:21
<b>earning</b> 176:3	6:17 7:2,20	<b>Eighth</b> 174:1	35:18 36:17	226:24 228:14
<b>ease</b> 66:18	8:14 390:1,18	<b>either</b> 19:22	37:11 38:6	230:5,22 231:8
<b>easiest</b> 359:14	391:1 392:1	27:9 48:10,18	39:4,13 40:10	232:1 233:11
<b>easy</b> 272:3 274:7	<b>EF</b> 45:9 46:4	50:2 59:6	40:18 41:6,24	233:14 234:14
<b>echo</b> 365:7	<b>EFELDF</b> 69:23	62:24 75:14,17	42:24 43:13,23	235:17 236:5
<b>Ed</b> 79:23 94:20	69:24 70:2,11	118:1,2,10	44:23 46:12,19	242:4 243:24
116:7 122:21	73:6 114:15	122:11 134:4	47:3,11,18	244:9,20
134:15 136:13	118:1,10 169:8	143:6 165:24	49:13 50:21	245:11,16
137:23 143:18	177:10,16,20	207:21 229:9	52:14,21 53:7	246:2,7,16,21
166:18 172:2	177:23 178:7	271:8 282:4	53:16,23 54:7	253:3 256:14
186:5 226:3	178:10,18,24	293:11 320:1	54:17 55:4,19	259:20 260:7
227:16 230:18	179:1,2,8,12	343:4,10,18	56:11,21 57:4	261:9,24 263:2
231:3 240:12	179:20 180:4,9	348:1 355:23	61:23 62:16	264:5,19 265:6
265:3 286:1	180:10,14	374:22 387:18	74:10 75:21	265:24 266:10
287:7 305:1	181:12,18	<b>elected</b> 40:9,12	87:21 93:1	266:24 267:7
359:6	182:5,17 183:2	175:18 378:4	97:18 104:13	269:2 271:21
<b>ed@phyllis</b>	183:3,6,11	378:10	106:18 107:6	272:2 276:23
110:1	185:16 193:8	<b>election</b> 21:3,4	107:13 109:8	277:12 287:7
<b>ed@phyllissch...</b>	197:23 200:22	27:12 29:11	115:9 116:12	289:15 294:15
110:18	202:18 275:6	31:2 87:6	117:2 118:4,12	297:12 303:18
<b>educating</b>	281:17 329:11	100:22 104:8	121:12 123:8	310:22 311:12
213:15,16	330:8 333:12	105:24 111:14	123:19 126:1	315:8,16
329:8 331:7	333:19,22	111:15 116:16	132:5 133:4,16	317:13,22
333:3	349:21 351:19	116:24 118:3	133:21 137:15	320:20 321:2
<b>education</b> 28:1	351:20 366:14	124:23 138:2	137:17 144:2	323:4,15
69:10,19	375:16 381:14	138:20 140:11	146:1 148:21	327:10 331:18

Edward Martin, Jr.

June 4, 2019

Page 409

344:11 367:10	321:23 323:5	76:18,20,22	<b>enter</b> 48:20	366:9
370:20 371:3	326:11 337:21	77:1,8,12,20	253:10,13,18	<b>envelope</b> 219:9
372:4,12 373:1	338:10 341:3	95:17,22	253:21	366:21 367:8
373:13 375:24	341:16,20	257:17 258:3	<b>entered</b> 48:7	<b>envelopes</b> 367:2
377:13 378:11	342:2,5,20	258:14,19,24	67:12 121:16	367:14,19
379:19 388:13	343:3,4 344:14	259:3,13 260:4	122:17 254:8	<b>episodic</b> 83:23
389:19	346:5 356:8	261:7 294:23	<b>entering</b> 48:11	84:1
<b>email</b> 15:17,21	368:11 369:9	295:12,23	<b>enterprise</b>	<b>episodically</b>
16:1,8,14	374:10 375:6	300:17 302:24	223:21	283:19
18:22 20:11	378:17 384:18	312:15,21,23	<b>entire</b> 96:15	<b>ERA</b> 27:21
23:10,11 24:19	<b>emailing</b> 187:15	<b>empty</b> 15:8	108:3,6,17	237:8
24:23 25:1,4	<b>emails</b> 15:3,12	<b>enacted</b> 338:23	109:5 136:22	<b>Eric</b> 337:1
25:20 26:1,15	15:15,17 25:10	<b>encompassed</b>	145:17 260:19	<b>Erik</b> 6:2 8:1
26:21 27:2	32:23 75:2,12	236:9	261:5 291:16	82:14 119:4
30:8,16 32:10	102:1,4 121:5	<b>encourage</b>	296:22 317:12	131:24 133:20
32:16 35:4	124:17,17	108:22	317:21	134:18 159:10
37:19 42:14	140:5,14	<b>encouraged</b>	<b>entities</b> 59:13	<b>error</b> 126:18
45:14 88:15	143:21 144:10	234:19	68:16 85:6	151:2,9 156:18
91:22 93:21	144:20 149:12	<b>ended</b> 81:8	114:10 153:11	159:6 236:7
96:14 110:16	152:19 158:7,9	108:13 174:3	170:11 187:10	<b>escapes</b> 170:21
113:21 116:7	170:20 256:20	258:16,22	190:22 191:9	<b>esolverud@sp...</b>
120:21 129:20	256:21 325:11	264:1,1 280:16	192:11 195:3	6:5
135:22 136:3	325:18,20	389:23	202:22 252:9	<b>especially</b> 27:4
136:13 137:22	368:13	<b>endorsement</b>	273:12 334:9	144:21 163:6
138:12,15	<b>embarrass</b>	83:1	374:5	222:12 259:24
139:21 141:1	186:3,6,22	<b>ends</b> 202:20	<b>entitled</b> 191:24	270:11 338:5
142:15 148:13	190:23 192:24	<b>enduring</b> 364:17	192:7	338:13 376:12
150:18,19	198:22	365:10	<b>entity</b> 18:16	383:14,15
160:7 163:11	<b>employed</b> 106:5	<b>energized</b> 366:2	75:19,19,22	<b>essential</b> 233:9
163:16 164:6,9	177:10 299:3	<b>energy</b> 31:14	76:5,22 108:11	<b>establish</b> 10:20
168:7 187:3	393:12,15	<b>engage</b> 89:11	114:16 121:4	86:10 165:23
195:16 196:1	<b>employee</b> 74:15	90:3 92:4,5,10	145:9 146:4	313:18 315:22
220:6 229:8,12	130:14 137:5	242:2,9 268:7	152:3 190:24	322:3 326:16
250:2,2 255:1	176:9 214:23	270:8 378:8	191:16,16,19	345:4 346:19
256:2,11 257:3	344:23 393:14	<b>engaged</b> 63:15	253:1,12,17,23	354:14,18
257:9 260:1	<b>employees</b> 67:2	63:16 140:2	254:5 255:8	<b>established</b> 78:3
268:20 269:12	67:4,9 130:17	226:19 238:20	272:23 273:21	209:17 210:5
269:13 273:1	130:19 248:6	270:6	276:19 277:8	<b>estate</b> 374:13,17
275:14,24	299:2	<b>engagement</b>	277:23 278:18	374:19 378:19
276:12,15	<b>employment</b>	144:13	278:23 296:3	378:22,22,24
281:12 282:18	176:16 215:3	<b>engaging</b> 117:24	296:18 300:5	379:2
283:4,15,24	<b>empowering</b>	218:16 270:16	303:2 308:5	<b>estimate</b> 372:20
286:21 290:2	213:14	368:23	322:17,24	372:24 373:3
294:18 297:3	<b>Empowerment</b>	<b>engineer</b> 117:22	323:1,13 334:5	<b>et</b> 1:4 5:2,20 7:4
313:14 321:18	75:18 76:1,4,8	<b>English</b> 172:24	350:19,21	359:13 391:2

Edward Martin, Jr.

June 4, 2019

Page 410

<b>Eunie</b> 314:14	321:18 339:9	137:13 139:6	360:21 361:4,8	231:17 334:20
<b>Europe</b> 212:17	339:20 344:15	139:15,19,21	361:11,14,19	369:17 379:6
<b>evaluation</b>	363:11 368:11	141:10 143:13	361:24 362:8	<b>experience</b>
289:13	369:9	148:9,13 149:8	362:13,15	27:19
<b>Evan</b> 156:7	<b>exchanged</b> 15:3	149:20,24	363:2,13,18	<b>expert</b> 93:16
<b>events</b> 230:21	15:12	150:18 152:8	366:22 368:4,8	<b>explain</b> 285:1
231:7 243:7	<b>exchanges</b>	152:12 155:1,5	383:19 384:11	342:6
330:18	269:18,19	159:21 160:1	384:15,16,18	<b>explicitly</b> 360:16
<b>eventually</b> 25:4	<b>excited</b> 353:19	161:15,18	386:10,14,14	<b>expose</b> 267:5
37:4 76:5,22	<b>exclusively</b>	166:9,12 168:3	389:7,10,16	<b>exposure</b> 12:11
77:8 129:22	215:19	168:6 169:23	<b>exhibits</b> 2:3,16	12:13
255:9,15	<b>Excuse</b> 82:4	170:3 171:1,9	3:1 4:1,20	<b>express</b> 117:24
296:12	107:3	171:14 186:23	359:1,5,20	118:8,19
<b>everybody</b> 71:13	<b>executed</b> 70:7	187:3,3 188:4	360:2	197:16,20
273:10 381:8	390:13	195:5,9 203:10	<b>exist</b> 55:16 64:8	<b>expressed</b> 80:21
<b>evicted</b> 292:6	<b>executing</b> 317:1	203:21 206:10	152:1 347:8	307:7
<b>evidence</b> 191:11	<b>exercising</b>	206:14,21	<b>existed</b> 95:11,12	<b>expresses</b> 326:2
192:8 301:13	266:22	219:22 220:3,3	95:14 96:3	<b>expression</b>
<b>evidenced</b> 236:9	<b>Exhibit</b> 2:4,5,6,7	220:16 235:16	152:7 248:9	65:19 118:19
<b>evolved</b> 208:11	2:8,9,10,11,12	235:20 236:4	301:6	<b>expressly</b> 8:12
208:16	2:13,14,15,17	238:2,13 247:9	<b>existing</b> 298:9	<b>extended</b> 66:17
<b>exact</b> 8:23 9:3	2:18,19,20,21	247:13,13,17	323:9 355:1,8	<b>extent</b> 9:9 13:5
121:7,8 142:24	2:22,23,24 3:2	247:20 249:10	388:19	13:14 16:17
<b>exactly</b> 28:16	3:4,5,6,7,8,9	254:15,19	<b>exists</b> 94:19	20:15 41:6
87:18 88:3	3:10,11,12,13	260:16,20	145:9 151:24	42:24 44:23
184:7 200:16	3:14,15,16,17	268:14,18	<b>expand</b> 223:18	47:12 49:13
275:12 306:6	3:18,19,20,21	282:2,5,10,14	<b>expansion</b> 214:1	50:21 52:21
<b>EXAMINATI...</b>	3:22,23,24 4:2	282:17 289:20	<b>expectation</b> 65:4	54:7 55:19
8:18	4:4,5,6,7,8,9	289:24 294:8	66:1	56:11,13 61:23
<b>examined</b> 5:10	4:10,11 14:18	294:12,18,21	<b>expected</b> 222:17	87:21 106:18
8:15	14:22 15:2,12	297:18,22	<b>expedited</b>	204:5 233:1
<b>example</b> 249:1	15:23 16:2	298:1 299:11	299:16 300:5	245:17 246:3
250:4	25:12,16,19	303:12 309:3	<b>expend</b> 164:23	246:16 256:14
<b>examples</b> 312:11	34:24 38:16,20	310:2,6,8	<b>expenditure</b>	259:20 317:14
<b>excellent</b> 25:24	38:22 45:7	313:8,12	138:22 156:18	323:5 360:7
<b>exception</b>	46:2 73:21	321:12,16	156:19,21	<b>extra</b> 384:7
306:22	74:1,20 75:2	324:23 325:4,7	157:6,10	<b>extraordinary</b>
<b>exchange</b> 15:18	88:8,12,15	325:21 327:3	<b>expense</b> 160:15	309:1
31:14 113:21	94:4,8,11 99:1	327:17 337:16	160:16,17,18	<b>eye</b> 163:5
129:20 150:18	99:5,9 113:15	337:20 340:22	160:23,24	
154:14 168:7	113:19 115:15	341:2,13,15	171:13	<b>F</b>
187:3 192:10	115:19 116:3	342:10,13	<b>expenses</b> 165:2	<b>F</b> 6:21
258:22 268:20	120:4,8 128:6	343:2,8,13	165:23 166:20	<b>fabulous</b> 271:17
282:18 290:2	129:13,17	344:14 347:17	167:5 168:8,11	276:22 277:11
294:18 313:14	135:17 137:12	347:21 360:18	168:14,18	278:2 281:7

Edward Martin, Jr.

June 4, 2019

Page 411

<b>face</b> 263:11 352:10	<b>fast</b> 117:12 291:3	375:21 376:5,9 388:17	95:2 96:23 97:5 110:24	202:3,4 329:8
<b>facilitator</b> 85:2	<b>fastest</b> 374:13	<b>filed</b> 31:2 125:20	147:3 155:15	<b>focuses</b> 329:2
<b>fact</b> 56:1 132:19 232:22 258:13 259:12 263:22 310:12	<b>favor</b> 214:10	238:3 241:18 299:16 303:11 370:10	155:22 176:3 187:5 203:11 210:21 211:8 221:9 232:4 250:5 271:12 271:13 342:1,5 348:16 350:17 363:19 385:6	<b>Foernsler</b> 120:16,17
<b>factor</b> 215:18 345:9,13	<b>February</b> 195:12	<b>filing</b> 9:4 125:13 377:9	<b>fit</b> 21:18 93:17 117:21 356:14	<b>folks</b> 26:16,20 28:6,8 30:23 31:9 37:5,10 38:5 86:15 87:14 111:21 111:23 178:17 196:2 242:18 339:11
<b>facts</b> 40:24	<b>FEC</b> 370:9 372:2,11	<b>filings</b> 298:18	<b>fits</b> 108:24	<b>follow</b> 27:5,9 181:9 201:12 255:4
<b>failed</b> 330:22 333:6	<b>federal</b> 116:24 118:2 128:19 128:20 173:24 202:4 234:20 338:23	<b>final</b> 113:24 114:4 348:12	<b>fitting</b> 30:11 279:18	<b>follow-on</b> 57:20
<b>fails</b> 139:10	<b>Feed</b> 137:24 138:14	<b>financial</b> 11:13 11:16,18 72:8 72:13,17,22 73:4 215:12	<b>five</b> 124:17,17 124:22 125:1 149:3 183:5 313:22 314:10	<b>following</b> 350:4 391:4
<b>fair</b> 14:16 41:21 97:17 218:5 221:22 225:2 245:10,12 273:8 330:17	<b>feel</b> 293:15 360:22	<b>financially</b> 393:16	<b>five-digit</b> 96:20	<b>footprint</b> 252:7
<b>faith</b> 191:4	<b>feeling</b> 105:2 278:11,11	<b>find</b> 26:15 37:4 64:4 66:17 87:18 88:2 101:3,15 130:11 138:3 142:4 240:15 240:20 257:23 272:10	<b>fix</b> 153:14	<b>foregoing</b> 390:2 390:11 393:7
<b>fall</b> 44:3 100:22 140:15 207:21	<b>feels</b> 218:3	<b>finding</b> 64:5,23 70:4 83:17	<b>flat</b> 336:6	<b>forenoon</b> 5:12
<b>Falls</b> 172:5	<b>fees</b> 69:9,12,15 135:1	<b>fine</b> 120:19 129:8 186:15 254:21 358:22	<b>Flip</b> 229:19	<b>foresee</b> 17:22
<b>familiar</b> 39:22 41:3,4,10,22 42:2 62:20 63:4 68:5 119:19 221:4 231:24 247:24	<b>fell</b> 178:16	<b>fine-tuned</b> 348:3	<b>Floor</b> 6:12	<b>forget</b> 69:5 147:24
<b>family</b> 101:3,5 101:10,22 102:2,8,9 223:17 244:17 265:11	<b>fellow</b> 365:13	<b>finish</b> 131:15,17 133:1 176:11 230:6	<b>Florida</b> 327:20 328:12,13 329:11,15 330:2,13,18,21 331:1,10,11,12 331:16 333:6 333:13 334:5 335:23 343:19 345:4 346:19 346:23,24 347:1	<b>form</b> 9:8 12:12 20:12,21 21:10 21:12,16 22:2 39:13 40:10,18 43:23 46:12 75:21 90:3 104:13 107:13 109:8 115:10 133:16 146:1 184:12,20 185:11 201:20 226:20,21 230:22 233:15 236:5 242:4 244:9 252:24 253:3,17,21 260:7 261:9,24 263:2,17 264:5 265:4 266:24 267:7 276:24
<b>famous</b> 245:15 245:19,22	<b>felt</b> 189:5,6 215:6 288:1,17	<b>firm</b> 69:5 119:19 119:24 120:1 371:14	<b>flux</b> 26:18 30:22 31:18,22	
<b>fan</b> 377:17	<b>fiduciary</b> 266:23	<b>finished</b> 133:2	<b>fly</b> 364:1	
<b>Fane</b> 5:14 6:2 7:13	<b>fifth</b> 315:14 364:20	<b>firmly</b> 356:18,22	<b>focal</b> 351:15	
<b>fantastically</b> 341:10	<b>fight</b> 212:16 222:12 328:3 338:5,12	<b>first</b> 9:21 15:21 18:8 25:6 45:6 45:15 81:9	<b>focus</b> 29:23 93:19,22 224:22 328:18 333:2	
<b>far</b> 54:10 101:4 101:16 196:7 200:8 299:7 333:16 359:6 383:5	<b>figure</b> 54:22 69:22 100:12 101:12 119:8 147:5 158:13 169:11 180:21 180:23 181:7 240:2 260:13 278:13 286:13 331:2 385:8		<b>focused</b> 164:14	
	<b>figured</b> 367:12			
	<b>file</b> 220:13			

Edward Martin, Jr.

June 4, 2019

Page 412

303:18 310:22	106:16 107:12	227:10,11,12	270:17 271:12	130:23 205:20
311:12 317:13	108:17 109:5	227:19,20	271:14 272:23	216:9 221:22
320:20 323:4	122:9 123:5,12	228:1,2,3,11	273:2,6,9,11	228:19 229:23
331:18 348:13	123:22 128:10	229:3,13,17,22	273:21 274:5	230:3 242:2,9
360:12 367:10	128:16 130:14	230:2,8,18,18	275:1,1 276:19	243:20 321:6
377:13 390:4	131:12 132:3	231:3,4,11,11	277:8,22,24	331:9
<b>formal</b> 59:15	135:3 136:22	231:14,17,18	279:3 282:24	<b>Forum.'</b> 255:6
234:1 274:22	137:5,9 160:8	231:23 232:8	283:14 284:14	<b>forum.org</b> 247:7
308:13	160:12,19,20	232:22 233:2	285:1,16,17,18	<b>forums</b> 204:18
<b>formally</b> 366:19	169:7 172:9	233:10,23	288:2,3,11,19	205:5 231:23
<b>format</b> 248:10	175:17,23,24	234:3,6,11	288:20 296:5,8	<b>forward</b> 21:1
<b>formation</b> 42:6	176:2,4,8,17	235:5,10,21	296:14,17,22	22:7,12 27:8
113:2	176:18 177:8	236:2,3,8,18	298:23,24	28:2 37:24
<b>formed</b> 46:5,10	177:20 182:4,8	236:20,20,21	302:11,14	41:19 65:20
47:5 51:11,11	182:13,14,17	237:3,3,4,10	303:13,17	70:23 75:16
265:10 324:3	183:1,4,6	237:14,17,19	304:1,4,10,16	130:20 161:11
<b>former</b> 282:23	184:5,7,17	237:20 238:1	306:14 307:11	277:16 294:22
282:23 302:23	188:22 191:19	238:11,18,18	309:17,21,22	316:19 317:8
<b>formerly</b> 223:6	192:5 193:19	239:7,9,14,20	310:9,10,14,15	333:16
274:4,10	200:3,24 201:4	239:21 240:1	310:16 311:10	<b>forwarded</b>
297:21	201:15 202:3	240:18 241:9	311:17 312:5,9	155:11 316:4
<b>forming</b> 22:21	202:16,18,21	241:21 242:1,8	312:9 317:12	<b>forwarding</b>
248:7 258:22	203:1,4,14	242:15,16,20	317:24 318:8	120:11,14
275:10,10	204:3 205:3,5	243:2,6,10,11	318:12,15,18	139:23 152:17
<b>forms</b> 96:16	205:9,10,14,14	243:14,18,22	318:21 319:11	282:21 283:4,6
<b>forth</b> 188:9	205:16,20,24	244:4,6,7,15	319:13,14,17	368:13
211:22 212:4,6	206:4,7,9,21	245:7,14,20,22	319:22 320:15	<b>found</b> 17:4
255:23	206:23,24	246:1,6,15	322:3,13,17,22	<b>foundation</b> 9:9
<b>forthcoming</b>	208:10,21,22	247:4,6,14	323:12 324:7	12:13 40:19
356:21	209:6,16 210:5	248:4,5,12,12	329:7,16 330:9	43:24 46:13
<b>forum</b> 1:4 5:2,20	210:17 211:22	248:20 249:2,5	331:17 334:17	104:14 115:9
6:6 7:4,24 9:6	212:10,23	249:10,17	336:9 344:18	150:9 184:13
9:15 10:1 11:2	213:13,24	250:6,17,20	344:22 346:12	184:21 246:8
11:7,13 12:11	214:6,9,14,19	251:8,11,21,22	348:17 351:1,3	260:8 351:5,14
13:10 16:9,15	214:22,23	252:1,12,13,19	351:4,14,18	351:18 370:20
17:8,19,23	215:5,10,11,16	252:20 253:1,7	355:10 357:12	<b>founded</b> 53:9
18:3 19:17	216:2 217:13	254:13 255:9	357:22 364:5,9	55:7 200:24
22:3,22 36:19	218:6,7,11,11	255:20 260:17	364:16,22	201:2,4,15,23
38:24 39:12	218:16,24	261:5 262:8,13	365:2,6,9,15	<b>founder</b> 38:12
43:22 44:7,22	220:4 223:1,6	262:24 263:9	366:16,24	50:3,11,19
45:12,20,23	223:18,22	263:15 265:5	367:3,9,17,20	<b>founding</b> 49:20
46:11 47:10	224:2,2,12,14	265:16,22	380:17,24	54:2 56:16
48:19 53:6,15	224:18,23	266:8,23 267:6	381:4,17 391:2	65:18 76:16
69:10,19 84:9	225:17,20	267:21 268:2,8	<b>Forum'</b> 205:4	77:2 202:1,10
84:13 106:5,13	226:5,7,15,16	268:9 270:7,9	<b>Forum's</b> 11:7	<b>four</b> 31:20 33:9

Edward Martin, Jr.

June 4, 2019

Page 413

100:12 117:22	188:23 193:20	114:23 188:23	277:18 294:2	101:19 104:4,9
124:17 159:11	200:4 208:8,9	189:23 190:6	335:4 384:7	112:2,18
163:22 164:3,6	226:17 229:22	191:12 193:3,7	<b>given</b> 57:16 98:8	113:10,14
164:9 209:24	230:3 236:21	193:15 195:18	127:18 301:15	134:21 138:13
210:6,7,9,13	237:11,15	195:22 198:7	<b>gives</b> 356:2	147:6 149:3
210:16 269:19	245:22 273:9	200:3,22 285:5	<b>giving</b> 29:5 31:3	162:11 166:3
315:13 380:7	275:2 292:11	375:13,17,17	31:3 55:11	181:7 190:14
380:21,23	310:16 312:10	386:20	249:20 258:2	190:22 192:12
381:15	329:8 330:10		295:12 335:1	210:24 239:11
<b>fourth</b> 152:20	334:17,19,21	<b>G</b>	<b>glad</b> 377:18	240:2,3 241:2
364:20	336:10 344:19	<b>G6</b> 16:18	<b>globalism</b> 324:5	254:11 257:24
<b>framed</b> 266:15	344:23 346:13	<b>gang</b> 255:2	<b>globalist</b> 371:21	277:16 282:13
331:24	351:1 356:21	<b>gathering</b> 198:2	<b>globalists</b> 338:6	298:6 305:20
<b>fraud</b> 226:20	365:6 366:13	<b>gazillion</b> 113:9	338:13	319:19 321:6
<b>free</b> 223:21	380:17 381:1	<b>general</b> 27:16	<b>go</b> 22:12 28:2	330:24 334:21
<b>frequent</b> 156:17	381:18	81:3 86:23	37:24 45:6	335:21 350:11
<b>frequently</b> 81:1	<b>funded</b> 230:9	115:2 121:5	60:7,9 64:5,23	359:4,17 369:6
<b>fresh</b> 63:2	252:20 383:22	127:9 163:16	65:20 98:12	375:24 383:5
<b>Friday</b> 17:2	<b>funding</b> 234:12	193:16,16	101:4 131:24	389:19
<b>friend</b> 326:6	<b>fundraise</b>	198:6 202:10	131:24 139:2	<b>good</b> 23:15 24:9
<b>friends</b> 356:20	387:24	202:12	150:20 159:8	26:11,11 92:14
357:8	<b>fundraiser</b>	<b>generally</b> 71:5	166:4,5 167:3	108:23 159:14
<b>front</b> 135:17	216:13	<b>generated</b> 61:2	172:13 206:17	159:15 178:19
140:12 268:17	<b>fundraising</b>	252:13	231:13 240:17	191:4 196:4
344:9 352:17	141:15 143:5	<b>Geneva</b> 196:9	240:19 249:2,4	211:15 213:21
<b>frustrated</b>	216:4,9,15	<b>gentlemen</b>	249:13,17	215:19 244:16
241:17 369:7	217:11 218:2	253:14	250:4,10,15,19	251:21 254:22
<b>frustrations</b>	228:12,20	<b>geographic</b>	266:17 274:14	271:7 272:20
369:10	386:15,19	228:8	275:9 284:12	285:13 331:7
<b>fulfilled</b> 210:11	388:4	<b>George</b> 125:10	316:24 321:9	338:22 374:1
<b>fulfilling</b> 266:22	<b>funds</b> 128:3	125:15	346:16 350:17	<b>Google</b> 220:24
<b>full</b> 94:21 102:12	292:21 361:11	<b>getting</b> 40:12	352:2 354:6	221:2
373:9,21 380:9	363:4 366:16	76:12 85:2	375:6 386:18	<b>gotten</b> 60:7
<b>full-time</b> 83:22	381:5	89:2 91:2	388:24	147:19 312:6
83:23 176:14	<b>funeral</b> 29:24	166:8 191:7,8	<b>goals</b> 272:22	<b>governed</b> 203:5
335:4	<b>funny</b> 26:10	267:11 369:4	350:4 376:19	<b>governing</b> 119:1
<b>function</b> 249:5,7	160:13 214:12	378:9 385:6	<b>God</b> 223:17	<b>government</b>
281:11	221:3 242:17	<b>ghostwrite</b>	<b>goes</b> 46:22	201:7,18 202:4
<b>functional</b>	259:4 273:19	143:18	163:22 164:16	<b>Governor</b>
319:18	339:19	<b>gifts</b> 356:24	186:10,11	174:21
<b>fund</b> 33:21,23	<b>further</b> 44:16	357:2,14	<b>going</b> 21:1 23:7	<b>granted</b> 57:18
45:8,12,20,24	80:22 201:24	<b>give</b> 15:6 27:7	36:12 45:8,10	381:5
69:10,11,19	207:19 284:12	29:8 155:5	65:19 70:16	<b>granting</b> 345:2
70:19 72:11	378:17 393:13	227:6 257:5	71:15 73:24	<b>grassroot</b> 162:7
160:20 176:2	<b>future</b> 110:9	258:1,19	74:8 100:15	<b>grassroots</b> 163:4



Edward Martin, Jr.

June 4, 2019

Page 414

233:13,20	326:20	<b>happily</b> 49:20	120:12 121:24	166:1 168:7,20
238:20 239:8	<b>guys</b> 13:2 254:11	<b>happy</b> 28:4	125:12,22	369:24 372:19
<b>gravely</b> 17:9,13	360:11 386:1	38:15 56:16	138:6,20	373:4
17:20	<b>H</b>	104:17 118:15	148:14,17	<b>hire</b> 124:9
<b>Gray</b> 336:2,8	<b>half</b> 373:10,23	131:1 228:23	150:19 151:13	140:24
<b>great</b> 92:14	<b>halfway</b> 42:18	267:13 315:21	154:1,15	<b>hired</b> 63:17
117:12 172:5	94:13	<b>harass</b> 186:3,22	<b>held</b> 207:21	122:15 135:6
316:22 375:22	<b>hand</b> 25:15	190:23 192:24	<b>help</b> 65:21 97:21	193:23
<b>greedy</b> 292:20	220:16 282:13	198:23	102:19 103:4	<b>historic</b> 28:20
<b>Grega</b> 6:24 7:9	297:15 327:17	<b>hard</b> 27:4 35:22	114:11 119:8	<b>history</b> 191:14
<b>grew</b> 234:19	353:1	80:1 110:12,12	119:14 135:1	238:5 286:8
<b>ground</b> 344:1,3	<b>handbook</b>	110:15 241:13	154:17 188:2	<b>Hite</b> 344:15,17
<b>grounds</b> 190:17	206:22 274:1	256:24 311:21	204:12 240:12	344:24
190:18 192:17	<b>handed</b> 321:15	<b>harm</b> 265:21	258:7,16 259:5	<b>hold</b> 22:17
192:23	<b>handful</b> 96:9	266:7	260:13 288:7	127:24 140:23
<b>group</b> 123:6	<b>handle</b> 174:15	<b>harmonize</b>	307:16 344:21	155:5 240:11
132:22 135:2,4	<b>handled</b> 174:18	212:16	346:14	370:12
170:11 275:5	207:3 208:5	<b>he'll</b> 258:1 294:2	<b>helped</b> 78:6	<b>Hollo</b> 5:16 6:23
<b>groups</b> 13:18	281:20 317:17	<b>head</b> 87:12	83:17,19 162:7	7:11 8:9
21:17 44:6,14	372:7	139:9 347:9	348:14 349:4	392:23 393:3
191:17 204:18	<b>handling</b> 224:21	<b>headed</b> 280:12	<b>helpful</b> 40:12	<b>Holy</b> 172:19,20
204:18 234:23	224:22 363:12	<b>headhunters</b>	57:22 80:18	<b>honest</b> 284:11
<b>guard</b> 355:16,16	<b>handwrite</b> 74:8	368:17	117:11 326:3	<b>honor</b> 66:2
<b>guess</b> 33:1 48:8	<b>Hanley</b> 6:15	<b>heading</b> 221:3	372:16	<b>hope</b> 25:23
71:4 84:4	<b>happen</b> 49:19	350:18 351:12	<b>helping</b> 40:8	100:10
87:14 151:15	117:12	352:23	121:23 154:11	<b>hopeful</b> 101:1
156:11,22	<b>happened</b>	<b>headings</b> 221:6	154:13 213:17	<b>hoping</b> 102:22
157:1,4 162:2	118:22 140:12	<b>headquarters</b>	343:21	276:6
169:3 172:14	153:13 223:9	207:1	<b>Henry</b> 6:14 7:17	<b>Horowitz</b>
176:20,22,22	226:14 240:20	<b>health</b> 195:14	<b>Henry@elster...</b>	289:12
179:16 213:5	254:14 259:6	198:12	6:16	<b>Horowitz's</b>
219:12 251:12	264:2 309:19	<b>hear</b> 74:9 150:11	<b>Hey</b> 30:13 44:14	285:10
254:1 255:22	330:21 344:7	150:12	229:18 316:20	<b>hospice</b> 104:21
263:19 265:8	346:15 349:19	<b>heard</b> 44:11	<b>high</b> 356:24	104:22 105:1,2
298:13 301:16	373:6 378:5	89:21 90:11	357:1,9,13,13	105:4,7
301:24 302:24	<b>happening</b>	142:17 253:9	357:23,24	<b>hot</b> 250:9
333:7 337:24	31:16 32:22	262:10 264:17	358:3,3	<b>house</b> 121:6
342:23 354:20	46:1 104:7	267:16 279:14	<b>high-priced</b>	196:19 197:4
380:21	139:2 140:11	279:14 301:16	151:12	350:6,7,10,12
<b>guessing</b> 156:11	144:6 193:11	307:14	<b>highlight</b> 165:18	375:21 376:5,8
<b>guidance</b> 147:19	198:2 213:10	<b>hearing</b> 256:11	<b>highlighting</b>	388:17
<b>Gunston</b> 170:5	258:8 278:14	<b>hearsay</b> 154:4	155:6 377:24	<b>hub</b> 248:19
170:10	320:11	<b>heavily</b> 219:1,4	<b>Hillman</b> 161:24	<b>huge</b> 291:16
<b>guy</b> 40:5,6 65:21	<b>happens</b> 147:10	<b>Heidi</b> 79:3 113:4	162:1,2,15	<b>Huh-uh</b> 32:1
117:10 275:19		119:13 120:1	163:11 165:13	169:14



Edward Martin, Jr.

June 4, 2019

Page 415

<b>human</b> 173:18	73:22 88:9	134:9,14	233:6 276:7	39:10 67:18
<b>humanly</b> 293:7	94:5 99:2	162:12 165:14	314:4 333:4,5	121:9 127:21
<b>hundred</b> 43:4	113:16 115:16	165:16 168:14	342:19 367:19	136:23 244:17
125:1	120:5 129:14	170:8,16	370:9	307:5
<b>hundreds</b> 224:3	137:14 139:16	205:22 207:2	<b>includes</b> 152:16	<b>individually</b>
<b>Hurry</b> 133:1	141:11 148:10	370:2 376:18	170:5 299:11	147:23
<b>hurt</b> 17:8,12,20	149:21 152:9	386:7	321:18,22	<b>individuals</b>
<b>I</b>	155:2 159:22	<b>image</b> 54:6,9,15	342:2	68:15 129:21
<b>Ian</b> 39:10,16	161:16 203:8	55:2,18,23	<b>including</b> 22:8	307:10 335:17
45:9 329:19	221:9 222:7	56:10	25:19 41:16	357:13
330:1 335:19	235:13 247:10	<b>imagine</b> 82:13	44:7 129:21	<b>inevitable</b> 17:23
343:13,19	297:19 299:24	82:15 106:2	142:5 207:23	19:16
<b>iconic</b> 310:17	310:3 313:9	<b>immediately</b>	227:19 244:4	<b>influence</b> 11:2,5
<b>Idaho</b> 355:20,21	318:22 321:13	271:14 315:22	303:12 324:4	<b>information</b>
355:24 356:1,6	327:4 337:17	387:3	<b>income</b> 61:1	63:1 64:2
<b>idea</b> 17:16 19:8	340:23 342:11	<b>immigration</b>	198:19 199:2	130:2 186:21
38:11 137:10	347:18 353:6	213:10 214:15	199:24 200:20	251:13 252:16
163:18 165:17	359:2 381:16	214:18 324:4	<b>incomplete</b>	252:19 300:1
275:19 285:13	<b>identifies</b> 302:7	338:6,14	339:14 349:6	339:5 385:22
316:2,3,10,11	313:22	<b>implemented</b>	<b>incorporated</b>	<b>informations</b>
316:20 317:1	<b>identify</b> 15:2,12	210:9 351:23	299:8	229:5
326:5 329:1,10	25:19 67:18	352:2 356:11	<b>incorporation</b>	<b>initial</b> 98:21
335:3 348:8	70:11 87:9	<b>importance</b>	76:7 299:12,13	<b>initially</b> 77:16
384:5	125:4,17	213:15 287:11	<b>incorrect</b> 342:1	329:22
<b>ideas</b> 70:5,6,22	139:21 203:10	<b>important</b> 31:6	357:16,18,21	<b>initiate</b> 269:21
73:10 160:23	235:20 274:16	216:9 222:15	358:1	<b>initiated</b> 270:22
161:10 163:17	282:17 297:22	222:19,22,24	<b>increase</b> 188:2	<b>initiating</b> 112:24
220:8 221:14	307:5 308:2	257:22 286:9	<b>incredibly</b> 119:7	<b>initiative</b> 329:10
255:17 275:19	310:8 313:14	289:11 291:23	<b>incurred</b> 370:17	333:10
275:20 277:14	344:14 389:10	310:18 326:9	379:5,6	<b>input</b> 220:14
315:18 349:7	<b>identifying</b>	333:9 353:16	<b>incurring</b> 371:1	221:18
386:22	315:7 330:12	<b>in-person</b> 90:14	<b>independent</b>	<b>inquiring</b>
<b>identification</b>	331:8	<b>inappropriate</b>	67:12,18 68:10	190:21
14:19 25:13	<b>ideological</b>	192:16 264:9	221:19 274:5,8	<b>inside</b> 69:6
38:17 166:10	42:16,23 44:20	276:18	274:17 275:7	<b>instinct</b> 285:9
168:4 169:24	<b>ignore</b> 255:2	<b>incidence</b> 310:9	280:22 350:10	326:19
186:24 195:6	384:21 385:13	<b>incident</b> 239:6	<b>independents</b>	<b>institutional</b>
206:11 219:23	385:15	<b>include</b> 183:4	233:24	181:24
254:16 268:15	<b>II</b> 221:24	257:8 314:11	<b>INDEX</b> 2:3 3:1	<b>instruct</b> 190:14
282:11 289:21	<b>illegal</b> 165:6	315:13	4:1	192:14,16
294:9 368:5	291:16,20	<b>included</b> 24:22	<b>indicated</b> 15:9	198:23
384:12 386:11	<b>Illinois</b> 1:2 5:1	25:1 105:5,6	144:16 391:4	<b>instructing</b>
389:8	5:19 6:19 7:8	183:1 211:22	<b>indication</b>	186:20 190:16
<b>identified</b> 50:11	17:8,19 26:18	212:10,23	132:24 354:21	191:1 192:22
	30:22 133:14	213:13 228:1	<b>individual</b> 8:2	199:6

Edward Martin, Jr.

June 4, 2019

Page 416

<b>instruction</b> 239:3	294:3	356:4,5	193:3 198:2	118:7,16,16,19
<b>insurance</b> 195:14 198:11 198:12	<b>investment</b> 61:1	<b>IRS</b> 116:24	<b>Jayne</b> 322:9,12	118:22,24
<b>intangible</b> 61:15	<b>investments</b> 61:4	118:3	<b>Jim</b> 141:14,15	119:3,10,12,15
<b>integral</b> 221:21	<b>invited</b> 207:22	<b>issue</b> 82:2 117:7	141:18,20,23	119:23 124:1
233:21	208:6	133:14,20,23	142:23 143:2,4	127:13,22,24
<b>integrative</b> 388:4	<b>invoice</b> 120:11	134:9 165:18	143:17,24	132:20 134:23
<b>integrity</b> 244:7	120:14 124:17	214:4 222:15	144:13 155:11	135:1,5,8
244:17 245:7	124:18 126:5	222:19,22	282:22 283:5,8	147:9,23,24
<b>intellectual</b> 57:3	140:4,6,19,21	233:19 273:19	283:9,10,13,17	148:1,3 149:19
57:5,10 199:16	152:17 155:15	274:20,24	283:24 284:3,4	150:3,7,13,14
345:8,12,15,20	155:22 157:22	275:5 343:22	290:13 291:1	154:18 157:14
345:22 346:1,6	157:23 158:23	353:1 378:21	293:21 294:2	157:15 165:8
346:10 382:20	158:23 166:15	382:13,16	<b>job</b> 193:23 197:6	166:18,19,20
383:11	166:17 170:5	<b>issues</b> 57:21	197:10 198:4	167:4,9 179:22
<b>intended</b> 153:4	<b>invoiced</b> 122:19	80:19 81:7	224:16,20	181:15,16,21
186:3,21 234:4	<b>invoices</b> 139:23	83:13 84:6	281:11 331:7	182:2,12,14,16
234:11	140:17 141:8	89:21 109:12	335:5	182:21 184:16
<b>intentionally</b> 49:20	155:11 156:13	154:4 163:9	<b>John</b> 6:21 15:4	184:24 197:12
<b>interactions</b> 80:9	156:22 157:8	165:10,18,19	15:13,15,17	197:16 206:22
<b>interchangeably</b> 14:16	158:20	167:18 193:18	16:8,14,23	216:7 224:22
<b>interest</b> 27:8	<b>involved</b> 41:9,22	199:15,16	17:2,6,11,22	229:18 239:4
44:8 164:16	41:23 42:5	213:10 214:15	18:3,19 19:8	241:10,11
263:20 309:13	56:6 67:21	222:5,7,24	19:15,17,19,24	252:23 253:11
343:21	79:4 86:7,9,17	223:9,11	20:11 23:11,21	253:16,22
<b>interested</b> 83:19	86:23,24 87:8	231:11 244:16	25:20 34:7	254:3,4 255:23
344:2 393:16	91:9,10 105:20	307:15 324:4,8	35:1 41:15	256:10 260:10
<b>interests</b> 277:22	108:21 118:10	324:12,13	48:1,2 52:4,10	269:16 279:12
303:17,24	128:13 138:21	325:2 328:20	58:23 59:5,6,6	286:3,17
<b>interference</b> 214:7	153:20,20	329:9 353:18	59:6,7,8,17	287:20 288:10
<b>internally</b> 284:24	246:13 247:6	353:18,20	60:20 62:13	289:2 304:9
<b>Internet</b> 382:5	291:3 309:10	354:4,10	64:6 65:1,13	305:5 309:14
382:11	315:14 322:13	364:15 377:24	65:14,14,15,16	318:17 321:19
<b>interview</b> 352:24	324:7 329:12	377:24 383:16	65:16,21,22	322:2,6,8
<b>invalid</b> 255:3	340:4 360:1	<b>item</b> 87:18 88:2	68:14 69:4,7	323:3 325:23
<b>investigator</b>	369:24 370:1	<b>items</b> 60:10	72:4,22 78:10	326:1,5,5,8,9
	372:6 374:6	198:7	78:18 79:1,14	326:12 341:3
	377:23	<b>J</b>	81:2 84:4 85:9	349:14 359:9
	<b>involvement</b> 77:24 78:4	<b>James</b> 6:6 7:23	86:4,19 87:11	359:23 362:1,3
	80:2 205:13,19	133:1	91:10,16 93:16	363:12 367:12
	241:4 248:3	<b>January</b> 160:4	94:11,18 96:9	368:12 369:7
	347:14	174:24 175:1	112:19 113:9	369:15 370:16
	<b>involving</b> 172:8	176:22 187:14	115:22 116:4,8	371:1,16 372:6
	<b>Iowa</b> 336:17,20	187:14 188:7	116:19,23	372:10,13,18
		189:10 190:3	117:3,6,8,12	372:22 374:24
			117:14,21,23	375:7 379:12

Edward Martin, Jr.

June 4, 2019

Page 417

380:22 381:23	86:19 87:10	308:12 326:20	53:12 54:1,12	143:19 144:3
382:9,17	113:7 147:23	331:5 348:13	54:19,24 55:12	144:11,24
384:20 385:1,2	149:16 304:3	351:5 356:16	55:14,21 57:6	145:11,19
385:10	305:7,10	376:10 385:21	58:1 59:10,17	146:23 147:10
<b>John's</b> 24:21	309:14 313:15	<b>kinds</b> 27:6 31:12	59:22 60:18,20	147:16,17
37:22 117:17	316:4,15,19,21	54:2 83:21	61:20 62:1,5	148:1 151:12
169:12 180:21	317:17 318:11	89:21 90:15	62:18,20,24	151:16 153:7
181:17,18	321:19 325:23	106:1 109:15	64:16,19 65:2	153:23 154:15
321:22 326:7	326:6 329:21	154:16 157:2	65:7,21 66:15	154:20 155:7
360:14,15	337:21 339:10	175:8 193:17	68:1,2,12	158:12,22
371:23	341:4,21 342:2	196:20 213:18	69:13,15,16	160:1,14,19,22
<b>join</b> 180:11	343:3 345:2,11	213:19 379:6	70:16 71:23	160:24 161:11
250:5 251:4	346:18 347:4	<b>knew</b> 44:10	72:2,15,17	161:12,13,19
<b>joining</b> 174:3	<b>Kathleen's</b>	90:20 104:23	74:21,24 76:12	162:17,20
239:20 250:20	326:3 342:5	104:24 111:13	77:17 78:17	165:7 166:13
<b>Jr</b> 1:16 5:10	<b>keep</b> 63:1 82:6	112:4,4 135:16	79:5 80:1	167:8,10,21,23
6:17 7:3 8:14	112:18 121:20	159:17 185:13	81:14 84:4,22	168:1 170:18
390:1,18 391:1	147:5 193:5	226:1,1 257:20	86:6,8 87:13	172:12 176:10
392:1	194:15,17,20	260:10 283:10	87:14,19 88:3	176:13 178:9
<b>Jsanders@sal...</b>	291:15,19	285:5 288:23	88:5,6 89:9,18	178:14 179:14
6:9	375:24 383:21	311:21 317:4	89:19,24 91:1	179:23 180:3,3
<b>judge</b> 174:1	<b>keeping</b> 305:8	319:11,14,17	91:21 92:1,2	180:5,18
293:4	305:10,11,16	354:8	92:12,15,17,18	181:14 182:6
<b>judgment</b>	<b>Keinath</b> 358:6	<b>know</b> 10:12,21	92:21 93:11,20	183:6,8 185:20
181:24 225:10	<b>kept</b> 66:13,14,15	11:19,22 16:24	95:4,5 96:8,22	187:11,17
277:19 375:14	176:12 306:4	17:2 18:21,24	97:7,10 98:10	189:9 194:21
377:20	<b>key</b> 44:11	18:24 19:3	99:5 101:15	194:22 201:2
<b>judicial</b> 222:21	223:11 329:9	20:8,8 21:18	102:9,12,15	201:22 204:7
<b>July</b> 163:10	341:8 353:20	22:10 23:22	103:10 104:22	208:18,19
164:10 389:11	356:23 375:13	24:16,18,21	105:1,8,18	214:13,24
<b>jump</b> 355:20	<b>kicked</b> 293:4	25:7,11,16	111:13,24	215:1,2,4,4,9
<b>June</b> 1:18 5:11	<b>kidding</b> 159:16	27:15 28:2,6	113:7,8 114:12	216:3 217:21
7:3 75:4,7,8,10	159:18	28:20,22 29:4	115:19 116:15	219:13,15
88:16,23 89:6	<b>kids</b> 140:15	30:1 31:9 33:5	117:3,18,20	220:13,15
89:10,16 92:19	141:1	33:11,17 34:14	118:18,21	221:16,17
96:11 97:15	<b>kind</b> 13:21 27:6	34:18 35:13,21	119:17 120:23	224:6,7,7,8,9
173:22 313:17	27:7 48:22	35:21 36:3,3,7	122:18 123:1	224:11 225:1,3
318:8 324:8,21	62:13 85:12	36:12 38:1,4	124:19,20,21	225:4,12,14
326:11 331:9	108:21 114:24	38:20 39:6,17	128:23 129:2,4	228:5,7,8,22
349:23	116:15 117:11	41:16 44:7	129:6 131:14	229:1 231:12
	138:16 156:18	47:13,19,24	132:10,12	235:22,23
	162:7 179:18	48:3,9,14,15	134:4,5,5,22	237:5,6,8,9,12
<b>K</b>	183:7 194:3	49:2,9,10 50:1	139:13 140:12	237:12 240:11
<b>Kansas</b> 174:2	217:7 220:10	50:13 51:19,22	142:11,14,15	241:1 242:24
<b>Kasba</b> 356:3	248:9 290:22	52:6,16 53:1	142:19 143:12	243:22 246:10
<b>Kathleen</b> 86:12				

Edward Martin, Jr.

June 4, 2019

Page 418

246:23 250:4,5	363:4,11,13,23	<b>launching</b>	232:17,18,19	<b>left</b> 367:15
252:2,7 253:13	367:4,5,6,13	100:17 277:7	232:20,22	374:15 383:21
254:1,7,19	367:14,15	<b>law</b> 5:13 6:14	233:2,3,5,18	<b>legacy</b> 333:3
255:19,19	368:2,3 369:5	119:19,24	233:19,19,20	364:15,17
256:8 257:13	370:22 375:1	120:1 172:16	234:19,22	365:10 366:7
257:14,19	375:12,14	173:16 175:2	251:9,12,16	<b>legal</b> 9:9 13:15
258:6,21	376:7 379:8	196:4 298:12	271:15,20,24	43:1,24 47:12
259:22,23	380:14 382:13	371:14	272:4,10,17,20	49:14 50:22
262:5 263:6	383:6,8,9	<b>lawful</b> 8:15	273:22 274:3,8	52:22 53:16
267:9 268:4	384:10 387:15	<b>laws</b> 116:24	274:17,20,21	54:8 55:4,20
271:6 272:17	387:21 388:9	118:3	274:24 275:5	57:5 61:24
272:21,21	<b>knowing</b> 25:9	<b>lawsuit</b> 23:1	276:20 277:9	69:10,19 95:15
274:7,11,14	193:9 194:18	31:2,8 172:8	278:1 279:8	106:19 107:14
275:18 276:5	<b>knowledge</b> 41:3	181:6 184:7,10	280:2 313:1,19	109:9 135:1
277:4,17 278:5	54:5,14,23	239:2 279:11	314:5 322:3	138:6 160:20
278:12 281:12	56:17 161:7	279:11	329:11 330:12	176:2,11
282:7,7,9	252:3 312:17	<b>lawsuits</b> 172:8	330:22 341:9	188:23 193:20
286:9,21 289:6	379:24	172:11 238:15	341:22 353:1	200:4 204:6
289:10 290:24	<b>known</b> 40:23	311:19	<b>leadership</b>	226:16 236:20
296:15,15	61:21 101:24	<b>lawyer</b> 119:18	265:15 315:23	237:11,15
297:8 298:15	108:9 152:3	131:21 153:20	322:9 357:14	245:17,21
301:17 305:22	263:11 307:22	<b>lawyer's</b> 77:2	357:22	261:10 262:1
306:8,21	<b>knows</b> 195:20	<b>lawyers</b> 91:17	<b>Leading</b> 197:11	263:3 267:8
308:13,20	<b>Kovar</b> 314:17	111:11,12,16	<b>League</b> 75:18	273:9 275:1
314:7 315:6,17	<b>Kretschmer</b>	130:23 135:6	76:2,5,8,18,20	301:24 303:18
317:7,8 318:1	93:13	151:13 157:14	76:22 77:1,8	310:16 312:9
318:3 320:10		157:15 165:8	77:13 95:17,22	317:14 320:20
324:1 332:11	<b>L</b>	241:7 246:17	257:17 258:3	329:7 330:9
332:15 339:7	<b>L</b> 75:14,17	372:6	258:14,19,24	331:18 334:17
339:20 340:17	<b>lack</b> 74:18 303:1	<b>lead</b> 192:8	259:3,13 260:4	336:9 344:19
342:7,8 345:21	<b>language</b> 204:9	197:13,17,21	261:7 294:23	344:23 346:13
345:23 347:9	204:10,12	222:4,8 232:12	295:12,23	351:1 365:6
347:12,12,21	298:14 342:6	261:18 262:17	300:18 302:24	380:17,24
349:22,24	343:15 346:16	315:22 355:15	312:15,21,23	381:5,18
350:1 351:11	351:3,4,6	<b>leader</b> 27:5	<b>League's</b> 77:20	<b>legally</b> 291:23
351:11 353:5	356:17 357:6	147:11 184:16	<b>learned</b> 235:11	<b>legislative</b> 207:4
355:19,20,21	388:21,22	234:18 314:6	<b>lease</b> 16:24 62:8	<b>legislature</b> 201:8
356:1 357:7,12	<b>large</b> 358:6	314:15 322:13	62:9,24	202:6
357:14,23	<b>late</b> 187:8	323:10 351:14	<b>leased</b> 16:19	<b>legitimate</b> 118:9
358:18,23	275:16	351:15 352:9	62:7,15,18	<b>lend</b> 307:23
359:8,21 360:1	<b>launch</b> 101:18	352:14 353:1,3	<b>leases</b> 61:7	<b>lengthy</b> 360:11
360:4,16 361:7	104:6 271:14	<b>leaders</b> 22:8	<b>leasing</b> 16:9,15	361:17 368:11
361:7,10,18,21	276:19 277:23	23:3 147:9	<b>leaving</b> 303:1	389:13
361:24 362:7	<b>launched</b> 100:11	207:23 232:9	<b>lectures</b> 204:18	<b>let's</b> 51:10 98:12
362:11,14,22	278:18,23	232:12,13,16	<b>led</b> 232:9 375:17	100:3 117:13

Edward Martin, Jr.

June 4, 2019

Page 419

138:7 212:1	198:11 202:19	226:4,11	<b>LLP</b> 5:14 6:2	206:14 209:19
258:18 262:6	218:11 223:6	240:13	7:13	216:3,6 220:8
297:15 341:8	223:19 224:12	<b>listening</b> 32:20	<b>local</b> 205:5	232:1 240:3,19
388:24	308:3,10,18	<b>listing</b> 314:11	234:4,13,20	247:18 256:23
<b>letter</b> 77:2	346:3	<b>lists</b> 33:8,9,14,16	338:23 351:13	257:2,10
141:16 143:5	<b>likeness</b> 54:6,9	33:17,18,23	<b>located</b> 205:21	267:11,13
143:11 216:17	54:15 55:3,18	34:1,3,6,9,11	<b>location</b> 226:19	269:3 274:15
216:20 219:9	55:23 56:10	34:12,13 61:22	<b>logo</b> 49:8,11	276:3 299:22
255:3 283:18	<b>limit</b> 228:11	62:7,7,15,17	348:17,19,20	325:19,22
344:24 346:5	<b>limited</b> 163:7	65:9,12 178:24	349:4	343:5 346:16
362:1,2,19,22	<b>line</b> 45:15 74:22	179:3 274:15	<b>logos</b> 61:17 66:3	347:22 362:6
363:6,16,19,22	75:15 93:8	302:20 359:21	<b>long</b> 27:4,19	368:9 384:16
366:6 389:10	110:9,12,15,24	<b>literature</b>	45:9,9 82:24	<b>looked</b> 27:3,4
<b>letterhead</b> 61:17	188:19 190:22	172:24	84:3,4 101:24	195:11 221:4
66:3,8,17	217:22 351:4	<b>litigants</b> 317:5	105:8 174:10	241:5 252:6
<b>letters</b> 143:7,8	363:19 364:19	<b>Litigate</b> 255:4	174:23 175:3	273:24 310:20
143:13,17,20	391:6,8,9,11	<b>litigating</b> 137:7	216:24 217:19	343:3 349:12
216:14 217:14	391:12,14,15	<b>litigation</b> 175:10	249:20 257:23	<b>looking</b> 25:16
217:20 218:1	391:17,18,20	240:8 262:15	266:17 281:9	45:17 105:24
218:12 225:5	391:21,23	268:7 269:21	326:6 331:1	124:16 160:21
230:19 231:4,9	392:2,3,5,6,8,9	271:8 318:3,5	374:22 382:21	161:19 267:15
231:10,12,16	392:11,12,14	318:7 385:3	383:4,9,12	267:15 283:2,3
231:18 323:18	392:15,17,18	<b>little</b> 30:3 32:19	<b>long-standing</b>	285:10 294:20
323:20,24	392:20,21	39:6 42:16,22	329:2	317:9 329:18
359:8,10	<b>lined</b> 281:13	44:20 165:19	<b>long-term</b> 221:7	373:16
<b>level</b> 22:11 202:5	<b>lines</b> 32:17	165:19 174:19	221:10,22	<b>looks</b> 16:3 17:2
233:13 234:20	188:15	175:12,14	<b>longer</b> 305:16	24:3,22 27:23
241:21 338:23	<b>link</b> 163:21	196:12 218:9	344:8	29:1 35:12
<b>levels</b> 234:5	250:9 251:5	218:10 220:9	<b>longstanding</b>	36:18 75:15
332:3	<b>linking</b> 366:7	221:3 234:1	128:20	79:2 120:21
<b>liability</b> 267:5	<b>links</b> 250:3	274:6,22	<b>longterm</b> 285:8	136:4,15
<b>liaison</b> 196:19	<b>list</b> 62:3,11,12	275:11 285:19	<b>look</b> 13:7 24:18	138:15 140:5
<b>liberal</b> 292:19	62:24 63:1	388:23	28:4 38:14	141:3 143:8,16
<b>liberty</b> 244:17	64:20 67:16	<b>live</b> 172:2	67:21 72:4	143:21 151:1
<b>license</b> 48:5	172:12 185:16	251:22 252:1	73:12 74:4	156:17 220:5,9
49:11 52:20,24	185:18 219:19	252:20 340:18	84:24 85:9,11	220:22 223:10
53:15 56:9	244:21,22	340:20	88:13 94:9	235:24 247:24
<b>licensee</b> 47:9	245:3 266:17	<b>lives</b> 340:21	99:6,8 115:20	247:24 251:11
49:7 52:12	272:19 336:18	<b>living</b> 291:2	120:9 129:18	251:15 282:6
53:5,21	351:24,24	<b>LLC</b> 6:7,14	136:12 155:8	316:16 339:14
<b>licenses</b> 47:17	352:1 353:23	120:12 121:3	159:8 160:2	342:18 348:1
55:17 57:17	354:22	<b>LLCs</b> 334:13	172:13 176:20	348:13 369:9
<b>licensing</b> 48:3,12	<b>listed</b> 222:9	<b>Lloyd</b> 165:12,13	177:4 188:15	386:2 387:18
48:14,22 56:5	306:11 321:9	166:1 370:1	189:19 195:10	<b>loop</b> 167:12
<b>life</b> 27:21 41:9	<b>listen</b> 50:4 79:23	<b>Lloyd's</b> 168:8	201:24 204:14	<b>looser</b> 274:6

Edward Martin, Jr.

June 4, 2019

Page 420

<b>loses</b> 271:13	<b>lump</b> 335:10	205:17 248:5	129:16 137:12	391:1 392:1
<b>lost</b> 186:1	<b>lunch</b> 159:10	305:13 306:19	137:14,19	<b>masthead</b>
<b>lot</b> 21:3 31:10	171:18,21	<b>maintaining</b>	139:16,18	348:16
36:20 38:13	<b>M</b>	305:24	141:11,13	<b>material</b> 380:16
40:11 46:22	<b>MAGA</b> 386:5	<b>maintains</b> 63:9	148:10,12	381:2,19,20
63:11,12 70:22	<b>mail</b> 63:21 83:17	65:2 66:3,5	149:21,23	382:5,11
70:23 71:13	83:18 89:2,3,4	207:1	152:9,11 155:1	<b>materials</b>
87:3 92:13	89:5,7,16,24	<b>major</b> 219:16	155:4 159:22	203:21 379:15
104:9 117:8,11	90:14,16 91:1	<b>majority</b> 265:21	159:24 161:16	<b>matter</b> 75:12
132:20 140:11	91:4 93:12,12	266:6 324:16	161:18 166:9	211:22 238:4
144:6 147:11	121:6 215:23	<b>making</b> 43:16	166:12 168:3	<b>mattered</b> 216:18
170:20 175:12	216:5,8,14,20	57:21 94:1	169:23 170:2	<b>matters</b> 65:23
175:15 189:6	217:6,7,19,23	124:23 132:20	186:23 187:2	<b>maxed</b> 168:22
201:22 224:9	218:1,8,20,22	163:5 164:16	195:5 203:7	<b>maximize</b>
236:9 248:7	219:11,19	377:3,20	206:10,13	288:15,18
275:17,20,22	221:11,18,21	<b>man</b> 326:1	219:22 220:2	<b>McDade</b> 314:6
315:18 317:4	225:13 229:8	375:13	235:12,15	314:23
336:6 353:21	229:12 360:10	<b>manage</b> 63:13	247:9,12	<b>McLarty</b> 314:20
354:11 355:24	374:1,2,10	<b>managed</b> 122:8	254:15,18	319:23
369:5,6	387:9,10	122:11 123:16	268:14,18	<b>McMullin</b> 156:7
<b>lots</b> 13:17 21:22	<b>mailed</b> 323:21	123:17 124:1	282:10,13	156:7
22:6,10 23:1,4	323:24	126:22 224:21	289:20,23	<b>mean</b> 10:9 11:18
27:19 31:15	<b>mailing</b> 33:17	376:19	294:8,11	16:4 17:12
44:13,13 70:5	49:2 68:20	<b>managing</b> 124:6	297:18,22	19:14,21 24:3
71:17 78:10	89:11 90:4,4	368:19,21	310:3,5 313:9	25:10 31:22
82:19 86:14	91:3 96:15,20	<b>Manning</b> 139:8	313:11 321:13	32:5 39:6 44:6
87:7 101:13	96:23 97:5	<b>March</b> 83:2	321:15 327:4,7	44:9 57:7,9
106:2 113:13	218:12 375:21	<b>margin</b> 383:21	327:17 337:17	60:6 61:13
115:24 149:15	376:5,14,15	<b>Marie</b> 5:16 6:23	337:20 340:23	64:3 65:13,15
160:23 161:10	387:3	7:11 8:9	341:2 342:10	65:18,22 69:24
163:17 165:9	<b>mailings</b> 23:13	392:23 393:3	342:13 347:18	72:2 79:6
179:14 198:4	23:19 24:14	<b>mark</b> 165:12,13	347:20 359:2,4	82:13 86:5
226:12 240:9,9	83:18 96:10,10	166:1 168:8	368:4,7 384:11	92:13,13 105:1
326:20 340:10	96:12 97:7	235:9 236:3	384:14 386:10	109:11 121:22
340:13 350:13	98:21 207:3	238:19 241:18	386:13 389:7	127:23 131:3
351:24	374:5,9 387:20	241:18 297:16	<b>market</b> 248:13	144:4 157:17
<b>Louis</b> 5:15 6:4,8	<b>maintain</b> 33:24	370:1	<b>marks</b> 238:24	160:11 162:20
6:12,16 7:14	62:24 178:24	<b>marked</b> 14:18	<b>marriage</b> 223:7	170:18 175:14
66:15 173:19	269:21	14:21 25:12,15	223:20	177:3 180:23
207:22	<b>maintained</b>	38:16,19 73:21	<b>married</b> 140:14	193:13 207:10
<b>Louisiana</b> 314:2	33:16,18 34:4	74:1 88:8,12	141:1	216:19 219:5,8
314:5,23	58:16 62:4	94:5,7 99:1,5	<b>Martin</b> 1:16	245:20 247:24
320:14,14	65:4 179:4	113:15,18	5:10 6:17 7:3	249:9 253:19
<b>loyal</b> 217:3	185:19 205:14	115:16,18	7:20 8:14,20	259:4 263:20
<b>Ls</b> 72:18		120:5,8 129:14	305:1 390:1,18	268:24 285:2

Edward Martin, Jr.

June 4, 2019

Page 421

287:22 289:7	351:15	296:12,14	<b>millions</b> 100:24	353:18
308:21 328:7	<b>medical</b> 105:6	301:19,23	101:8 102:19	<b>mm-hmm</b> 19:20
337:7 342:23	<b>meet</b> 144:23	309:3 329:5	<b>mind</b> 58:10	32:4 99:19
345:20 346:2	<b>meeting</b> 109:14	364:4,8 365:15	111:8	109:22 128:8
350:23 356:1,6	145:14,16	<b>membership</b>	<b>mine</b> 155:5	131:22 138:4
356:10 357:4	146:19,24	178:18,21,24	324:21	149:9 155:14
357:12 362:4	197:23 198:3	179:16,16,17	<b>mine's</b> 250:22	155:17 156:1
374:8 389:13	220:7 239:19	179:20 180:4,7	<b>minority</b> 307:10	163:13 167:20
<b>meaning</b> 63:17	240:16 241:3	209:6,16 210:4	<b>minutes</b> 5:11,12	168:10 170:4,9
153:21	255:3 261:14	210:8 215:12	239:20 240:16	206:16 222:6
<b>means</b> 10:8,13	261:18,19,20	216:5 249:2,11	240:19 241:3	226:6 234:7
10:22 11:18	261:23 262:7	250:11,12	297:5 321:23	251:13 256:23
19:24 32:20	262:16,19	251:5 265:15	<b>mischaracteri...</b>	268:19 269:8
34:20 36:11,13	349:24	<b>memberships</b>	253:8	293:24 302:6
36:21 39:2	<b>meetings</b> 147:13	207:2	<b>mischaracteri...</b>	302:22 321:21
44:9 48:2,15	147:16	<b>memorized</b>	13:6 16:18	322:19,23
57:12 66:7	<b>member</b> 42:9	201:11	20:16 132:5	327:8 350:20
92:7,12,16,18	45:3 48:10	<b>memory</b> 73:11	133:21 226:24	360:13 362:16
95:5 123:4	50:5 173:12	161:13 181:24	259:21 289:16	378:20
131:1,2 142:5	188:10 189:3	383:8	323:5	<b>modify</b> 354:9
159:16 161:1	210:17 211:8	<b>Mencken</b> 29:3	<b>mishandled</b>	<b>moment</b> 24:2,2
170:12 177:5	214:22,24	<b>mention</b> 276:11	292:21	28:20 29:18
178:9 187:11	215:3 241:3	276:14 280:14	<b>misrepresent</b>	47:20
206:6 214:11	249:16,18	<b>mentioned</b> 14:3	40:24	<b>momentum</b>
228:6 237:13	250:16 318:6	79:21 330:22	<b>missed</b> 45:13	28:23
253:14 265:9	<b>members</b> 109:11	<b>mentioning</b>	<b>missing</b> 48:4	<b>money</b> 63:12,20
268:4 278:17	147:8 178:7,10	341:22	177:5 213:23	63:23 71:20
322:17 329:14	178:13 179:11	<b>mentored</b>	314:7,9 339:9	96:4,6 125:11
332:11 350:9	179:12,15	355:15	<b>mission</b> 50:15	130:4,7 132:21
357:8 367:13	180:19 181:12	<b>message</b> 16:4,7	92:5,6 267:22	135:19,24
<b>meant</b> 19:3,8,8	185:17,21	16:13 17:3	268:9	138:24 142:23
35:15,19,21	188:10 208:21	33:7 346:8	<b>Missouri</b> 5:15	154:18 189:1
36:3,4,7,12,16	208:23 209:4,9	<b>messaging</b> 32:7	5:17 6:4,8,12	191:17 197:8
46:14 120:2	209:12 215:12	<b>Michelle</b> 345:3	6:16 7:14	199:7 200:15
133:13 159:20	217:14 229:5	346:18,22	59:24 172:14	215:20,21,22
161:24 190:23	229:13 242:16	<b>Michigan</b> 141:1	173:3,4,9,13	215:24 217:5
217:19 231:12	242:21,24	329:23	174:14 175:19	217:16 218:13
277:17,18	243:15 261:1	<b>middle</b> 110:1	207:22 393:6	218:13 225:7
278:7 290:24	261:12 262:4	250:8 285:14	393:21	226:2 227:4,6
345:16 349:10	262:12 270:15	385:18	<b>misspoke</b> 280:11	227:9,9 230:8
385:24	276:8 279:12	<b>midst</b> 256:9	<b>misstated</b> 28:13	260:5 291:9
<b>measure</b> 13:22	286:3 287:20	278:10	<b>mistake</b> 158:19	293:21,23
<b>mechanism</b>	287:21 288:11	<b>military</b> 149:5	371:10	294:3 333:22
219:8	289:2 293:8,11	<b>million</b> 100:13	<b>mistaken</b> 379:9	334:4,21 335:1
<b>media</b> 219:2	293:13 296:12	100:19 124:17	<b>misunderstan...</b>	335:18 356:15



Edward Martin, Jr.

June 4, 2019

Page 422

356:22 358:6	29:12 30:13	295:8,12	89:4 90:3 91:1	262:22 305:13
363:14 373:10	37:20 38:1	300:17 307:23	103:1,7 104:1	306:19 309:19
373:22 374:23	41:19 235:3	308:5 309:7,16	111:24 118:24	311:15 356:11
384:7	<b>muddled</b> 298:16	310:17,21	131:17 138:5	375:13 380:8
<b>monies</b> 85:5	<b>multiple</b> 28:24	311:6 324:22	159:9 166:5	380:22
134:19 136:23	50:12 123:17	325:4,5,6,13	169:10 187:5	<b>new</b> 27:17 90:9
164:23 198:8	250:3 282:6	325:16 346:10	195:13 199:21	100:16 169:5
217:13 218:7	<b>museum</b> 329:6	390:8	230:5 313:18	169:17 253:1
333:12,18	<b>muted</b> 291:16	<b>named</b> 39:10	322:9 324:14	253:12,17
<b>Montana</b> 336:17		74:21 255:9	327:9 359:9	254:5 255:4,14
336:24	<b>N</b>	<b>names</b> 64:16	370:7 373:22	258:22 261:6
<b>month</b> 8:24	<b>N</b> 6:1	94:21 102:10	380:9	265:4 268:23
193:14 335:17	<b>nailed</b> 335:14	102:12 153:2	<b>needed</b> 27:13	272:22 295:7
336:12,13,22	<b>name</b> 7:9 54:6,9	162:17,18	35:3 89:21	295:10,12
365:23,24	54:15 55:2,18	237:7 238:24	90:16 103:10	296:3,18 303:2
<b>monthly</b> 72:18	55:23 56:3,10	274:13 278:21	112:8 116:11	307:2 313:18
72:21 73:1,2	57:19 65:6	285:7 299:9	197:6 255:2	313:19 315:23
<b>months</b> 28:22	69:5 74:23	387:12	260:10 307:15	321:7 322:3,8
87:6 257:22	77:10,11,12,15	<b>naming</b> 152:6	326:23 335:3,5	322:9 325:14
284:24 344:7	77:17,20 95:12	309:10	354:2 355:14	326:16 328:6
365:23	95:13,21,24	<b>nation</b> 60:14	357:11 373:10	329:9,10,18
<b>monumental</b>	99:23 100:2,5	229:2	<b>needs</b> 163:20	333:10 338:4,9
371:9,22	105:11 119:16	<b>national</b> 78:12	190:20 369:16	341:21
<b>moot</b> 183:7	119:17 120:17	207:24 222:18	382:5	<b>news</b> 229:5
<b>morning</b> 251:23	139:10 145:7	223:20 233:19	<b>neither</b> 235:1	<b>newsletter</b> 217:2
<b>mother</b> 41:4	146:6,10 160:5	234:10,18	342:21 393:11	217:3,4
<b>mother's</b> 255:5	162:13,14	241:21 246:1	<b>nerves</b> 116:5,9	<b>nice</b> 92:13
255:14	163:23 171:8	387:24	116:10	<b>Nichols</b> 356:6
<b>motion</b> 131:13	171:11,12,12	<b>NATO</b> 214:1	<b>nervous</b> 115:22	<b>night</b> 17:2
132:8,15,18	204:3 205:2,4	<b>nature</b> 63:3	<b>nervousness</b>	275:16 359:15
133:10 134:2,2	205:10 216:17	244:19	116:5	<b>nine</b> 5:12,12
134:4,5,6,7	216:20 235:5	<b>nearly</b> 374:2	<b>net</b> 357:13,23	<b>noise</b> 98:13
<b>motivated</b> 27:18	236:10,18	<b>necessarily</b>	358:3	<b>nominal</b> 260:4
<b>move</b> 22:7 23:2	237:4,12,19	144:7,19	<b>Network</b> 252:6,7	<b>non-stock</b>
26:16,24,24	239:14 241:21	<b>necessary</b>	252:10	298:11
28:15,17 29:13	242:1,6,8,15	371:11 390:6	<b>Nevada</b> 113:24	<b>noon</b> 159:10
30:23 37:4,10	242:19,20	<b>Ned</b> 187:4	114:5,8,14	<b>Nope</b> 200:19
38:5,23 70:22	243:2,6,10	195:13,17,21	337:7	<b>normal</b> 293:3
130:20 182:1	244:6 245:15	196:1 355:17	<b>never</b> 34:22 47:2	<b>North</b> 5:14 6:3
257:24 259:7	245:24 246:5	368:13,16	49:23 50:7	7:13 304:22
294:22 295:2,6	246:15 247:4	376:19	91:9 157:19	<b>Northon</b> 39:10
295:11,20	255:5,14 278:7	<b>need</b> 26:15	196:15 223:8	329:19 330:2,2
296:23 297:1	285:6,8,10,17	30:20 35:1,17	237:3 240:1,4	335:19 343:13
<b>moving</b> 27:14	287:15 288:5	67:23 71:24	241:5 253:6	343:16
28:1,6,16	288:19,22	78:7 80:20	261:22 262:19	<b>notes</b> 202:1



Edward Martin, Jr.

June 4, 2019

Page 423

203:17,18 <b>notice</b> 30:15 <b>noticed</b> 163:7 <b>noting</b> 218:3 <b>notion</b> 201:5,16 339:15 383:2 <b>November</b> 15:5 15:22 20:20 21:9 22:2,20 24:4,7,12 25:22 28:18 35:9 38:11 139:22 140:22 141:2 144:1 148:14 152:18 154:21 155:10 159:4 360:8 363:19,21 364:7 368:12 369:8,12,15 372:18 373:8 373:12,13,15 373:16,18 375:7 379:12 382:18 <b>number</b> 7:6 64:1 73:8 97:9 110:2,5 155:23 166:13 198:7 222:11 291:2 291:22 292:19 293:2,6 294:6 323:19 325:7 325:12 353:11 358:15 380:6 <b>numbered</b> 157:24 250:23 <b>numbers</b> 109:21 109:23 224:6 339:21 <b>Numeral</b> 221:24 <b>nuts</b> 43:9  <hr/> <b>O</b> <hr/> <b>O</b> 6:2	<b>o'clock</b> 5:12,13 17:3 98:18 <b>O'Neill</b> 125:10 125:15 <b>Object</b> 40:18 41:6,24 44:23 56:11 260:7 303:18 367:10 <b>objection</b> 9:8 11:4 12:5,12 13:5,14 16:17 17:14 18:5,18 19:5 20:15 21:12 22:4,23 23:24 35:18 37:11 38:6 39:4,13 40:10 42:24 43:13,23 46:12 47:11 49:13 50:21 52:14,21 53:7 53:16,23 54:7 54:17 55:4,19 56:21 57:4 61:23 62:16 75:21 87:21 93:1 97:18 104:13 106:18 107:13 109:8 115:9 116:12 117:2 118:4,12 121:12 123:19 126:1 133:16 144:2 146:1 150:9 153:6 155:18 157:18 178:4 184:12 184:20 185:6 185:11,24 189:24 190:4 190:10 198:21 199:4 201:20 202:8 204:5 208:13 219:3 223:2 226:21	228:14 230:22 231:8 233:11 233:14 234:14 236:5 242:4 243:24 244:9 245:16 246:2,7 246:16 253:3 256:14 259:20 261:9,24 263:2 264:5 265:6,24 266:24 267:7 271:21 272:2 276:23 277:12 289:15 310:22 311:12 315:8 315:16 317:13 317:22 320:20 321:2 323:4 331:18 370:20 371:3 372:4,12 377:13 378:11 <b>objections</b> 9:17 10:3,11 11:15 36:17 46:19 47:3,18 186:19 244:20 266:10 323:15 <b>objective</b> 90:17 328:11 <b>obligation</b> 303:16 <b>obscene</b> 188:16 <b>obtain</b> 39:11 270:8 <b>obtained</b> 235:9 <b>obvious</b> 25:5 93:10 <b>obviously</b> 30:2 55:7 124:12 137:3 153:12 345:11 <b>October</b> 129:23 130:1,9,13 132:23 135:23 137:23 138:11	140:8 155:15 383:20 384:9 <b>offer</b> 196:10,16 197:4 258:11 <b>offered</b> 196:3,5 196:17,24 <b>offering</b> 43:8 258:7 <b>offhand</b> 64:1 <b>office</b> 5:14 6:14 16:9,15 17:19 52:6,8 66:17 66:17,22,24 173:19 196:18 205:14,17,18 205:20 206:2,5 206:7,9 207:1 207:3,4 291:23 292:14 301:1,3 302:7,10,14 305:8,11,11,13 305:17,22,24 306:20 <b>officer</b> 49:23 50:6,7,19 59:18 224:2 241:4 303:2,8 304:9,15 307:18,24 308:4,16 318:17 <b>officers</b> 51:3,12 51:17 207:24 267:6 301:5 303:5 306:24 307:3 308:15 <b>offices</b> 207:1 292:17 305:1 306:10 <b>oh</b> 9:23 34:5 35:10 58:9 74:24 76:13 77:6 78:17 89:8 97:3 101:1 111:1,4	114:7 126:11 142:15 143:19 204:23 212:5 218:23 238:9 239:13 247:21 250:2 269:4 274:14 308:7 311:18 315:3 332:18 337:12 363:20 371:12 <b>okay</b> 8:24 10:15 10:24 11:12 12:3,9,17,21 15:21 17:11 18:11 19:2 20:1,20 21:21 23:10,21 26:5 31:3 32:13 33:7,14 34:11 34:22 35:10 36:8 38:21 39:3,19 40:14 40:23 41:2 42:3 45:6,22 48:18 49:6 51:10,16 52:11 57:2 58:3 63:6 63:10 64:14 74:3,6,17 75:2 75:11 76:13,21 77:6,12,23 78:9,21 79:24 80:5,6,8 81:21 82:11 83:12,14 84:16 85:19,23 86:13 88:14 89:6 90:8 94:10 95:3,23 97:23 100:8 102:14 105:20 107:4,19 108:5 109:3 110:5,10 110:16 111:8 113:5,20 115:1 115:4,18,21
---	---	--	---	--

Edward Martin, Jr.

June 4, 2019

Page 424

120:10,16,23	228:7,11	357:19,22	<b>operate</b> 23:14,22	<b>opposing</b> 377:7
122:14 124:2	229:11,17	358:2,11 360:1	24:8 33:3	<b>opposition</b>
125:23 129:1	232:8 234:9	360:17 361:10	65:20	263:12 371:15
129:19 131:18	235:8,15,18	362:15,19	<b>operated</b> 53:11	<b>opted</b> 302:24
131:19 133:6	236:1 237:16	363:21,24	122:9 237:19	<b>oral</b> 345:12
133:10 134:10	237:24 238:9	367:24 368:10	239:3,5,9	346:5
135:7,23	238:10 239:24	369:12 370:4	260:21,23	<b>orbit</b> 27:21
136:19 137:4	240:1,6,14,22	371:6 376:17	382:18	<b>order</b> 90:17
137:11,17,20	240:24 241:2	377:7 379:22	<b>operating</b> 51:1	103:2 177:2
138:7 139:8,20	241:11 244:15	381:22 383:4	55:8 124:6	183:7 210:16
142:9 143:22	245:14 246:13	384:17 385:12	238:1,5 267:21	211:7 219:18
145:21 146:15	247:18 249:9	386:13 387:17	293:3	262:16 300:5
146:16 148:24	249:16 251:1,7	389:18	<b>operation</b>	<b>ordinary</b> 30:12
149:18 150:1	254:3,24	<b>Oklahoma</b>	144:18 257:5	<b>organization</b>
150:16 151:10	256:20 269:8	314:2,20	<b>operational</b> 54:3	10:10 13:17
152:13,15	269:18 271:3	319:21 320:7,8	257:5,16	18:16 19:17
155:9 159:13	271:10 272:8	320:11	<b>operations</b>	20:13,21 21:2
160:3 161:2,20	273:16 280:4,8	<b>old</b> 207:12	26:16 28:17	21:10,13 22:2
165:15 166:18	280:23 282:16	355:16,16	29:12,17 30:5	22:5,21 27:7
167:1,15	282:21 283:8	<b>Olsen</b> 337:1	30:24 37:5,10	38:12 42:15,22
168:20 169:20	284:17,23	<b>onboard</b> 169:17	37:20 38:2,5	43:17 50:12,17
169:22 170:14	289:5,23 290:1	<b>once</b> 356:22	229:23 230:3,9	53:10 57:18
171:17 173:23	294:2,20 295:5	388:6	268:1 354:14	71:1 76:16,17
174:3,20	295:6 297:4,12	<b>one-person</b>	354:18	77:11 78:8,19
175:13,22	297:17,24	123:6	<b>opinion</b> 36:14	80:13,21 81:8
176:3,23 177:2	298:10 299:6	<b>ones</b> 85:12	43:16 46:3	90:9 91:20
177:15,23	299:23 300:4	109:11 134:14	<b>opinions</b> 198:4	93:15 95:13,24
178:7 180:8,13	302:18 308:2	164:12 169:5	<b>opportunities</b>	114:21 122:10
181:20 182:9	312:18 313:13	203:24 282:6	109:6,9 317:9	139:10 144:19
182:21 187:7	315:6 316:9,14	301:6 314:10	317:12 320:19	146:4 169:3,4
188:4 192:2,19	316:18,21,24	360:11 361:17	320:24 321:5	177:24 178:18
194:24 195:8	318:2 319:10	380:16 386:9	<b>opportunity</b>	180:19 181:1
196:1 199:11	319:20 320:12	<b>ongoing</b> 21:18	106:15,19	181:22 183:20
202:3,21	322:7 323:6,8	27:10 37:7	107:11 261:6	184:19 205:2
204:13 205:13	324:13 327:24	80:24 83:24	261:10,23	209:6 210:12
206:16,18,21	328:19 332:21	178:13 179:19	262:1,22 263:3	213:7 215:1
208:7,20	334:8,15 335:1	181:11 198:3	263:9,14	234:1 242:22
209:10 211:2,5	335:8,12,15	305:24 306:4	317:20 320:21	243:23 258:17
211:7 213:24	338:1,21 339:4	<b>online</b> 382:20	320:22 331:15	258:23 261:12
215:2,21 216:1	339:12 341:15	383:1	331:19 339:16	265:5,17
218:19,23	341:18 342:15	<b>onslaught</b> 31:8	<b>oppose</b> 162:21	274:10 285:10
219:8 220:11	344:12 345:18	<b>open</b> 95:4	165:2 331:10	286:14 298:9
220:18 222:18	348:21 349:15	176:12 196:13	<b>opposed</b> 60:11	298:12 307:15
225:16,17	350:2 353:14	<b>opened</b> 94:16	160:21 212:15	307:23 308:21
226:4 227:20	356:7,10	<b>opening</b> 94:12	218:1	317:10 319:19

Edward Martin, Jr.

June 4, 2019

Page 425

320:17 323:9	298:12	<b>P.O</b> 302:15,17	224:12	252:20 300:4
323:21 324:24	<b>organizing</b>	<b>PAC</b> 53:6 99:21	<b>page</b> 2:1,4 3:2	335:18 374:21
325:14 329:7	162:8 163:4	99:23 100:1,1	4:2 15:8 42:17	374:23 379:3
338:4,21	<b>original</b> 16:4,7	100:2,5,7	42:18 45:6	<b>pain</b> 293:16
340:15 348:11	16:13 169:15	103:2,7,18	87:18 88:2	<b>panels</b> 204:18
351:2 352:19	<b>originally</b> 299:8	105:11,16,21	99:8 163:21	<b>paper</b> 66:9
358:16,16	329:24	106:13,16	188:15 206:15	310:11 338:17
366:9	<b>ought</b> 116:9	107:12 108:8	206:15,17,24	<b>paperback</b>
<b>organization's</b>	<b>outcome</b> 393:16	108:19 109:19	207:19 249:9	101:13
238:4	<b>outcompete</b> 35:2	110:21,21	249:15,24	<b>papers</b> 332:9,12
<b>organizational</b>	35:3,17,19	111:5,6,7,9,10	250:5,11,15,19	332:20
169:6 206:22	36:11	112:3 113:3	251:7,8,10	<b>paperwork</b>
<b>Organizationa...</b>	<b>outcompeting</b>	121:10,22	299:22 301:6	332:16
29:19	46:4	122:1,1,7,12	302:4 348:16	<b>paragraph</b>
<b>organizations</b>	<b>outreach</b> 89:22	122:16 123:2,5	350:2,17 353:7	29:19 352:7,7
14:4 19:10	114:24 124:12	123:12,13,15	354:13 358:14	364:20 376:2
20:14,22 21:11	124:12	123:22 124:2,7	366:22 369:13	379:21
22:22 30:11	<b>outside</b> 63:12	124:24 125:5	375:10 376:2	<b>paragraphs</b> 29:1
41:4,11,11,22	69:2 148:17	125:18,24	379:17,18,18	<b>Pardon</b> 212:12
43:3 66:18	215:3 350:5	126:6,9,10,12	379:19 388:3	<b>Park</b> 172:5
68:19 69:9	<b>overlap</b> 233:5	126:14,24	391:6,8,9,11	<b>part</b> 18:8 24:23
83:18 84:11,12	346:15	127:2,3,4,16	391:12,14,15	32:23 40:15
93:17 108:24	<b>overlapping</b>	127:20 128:1,4	391:17,18,20	47:20 48:19
114:19 117:21	192:6 193:19	128:6,9,10,12	391:21,23	90:2 95:2
128:22 141:21	<b>overly</b> 223:3	128:16,19,20	392:2,3,5,6,8,9	101:21 135:9
176:6,14	<b>oversight</b> 307:21	129:9,11 136:5	392:11,12,14	144:4 170:10
182:23 197:11	<b>owned</b> 62:12	136:8,10	392:15,17,18	182:19 186:12
197:14,18,22	127:3,4 284:14	137:24 138:17	392:20,21	202:12 221:23
198:20 200:1	<b>owner</b> 47:9 49:7	138:19 148:20	<b>pages</b> 217:20,21	224:16 233:9
202:19 209:2	52:12 53:5,21	149:2 150:21	249:22 300:10	233:21 240:17
217:10 227:7	<b>owns</b> 54:5,14	150:24 151:2,4	<b>paid</b> 63:20 84:20	241:6 255:24
227:10,18	61:16 62:15,17	151:15,19,23	85:2 97:23	261:14 263:22
228:1 229:16	126:22 127:3,3	152:4,6 153:1	98:2 106:10	269:2 270:20
233:8 234:13		153:5 154:18	121:18 122:19	274:24 275:5
244:13 248:16	<b>P</b>	154:22 155:13	124:13 134:20	279:16 287:21
248:17,23	<b>P</b> 6:1,1,6,10	156:10,16	142:23 151:19	307:10 310:19
249:6 274:12	72:18	157:2,12	152:23 166:19	338:19 339:3
309:17,24	<b>P.C</b> 6:11,18	158:17 159:7	168:11,14	345:6 351:2
312:13,16,20	<b>p.m</b> 171:20,23	160:22 236:10	169:10 170:23	366:5 369:10
313:1,2,18	171:23 230:12	236:21 370:18	171:13 175:23	<b>participate</b>
318:21 319:1,7	230:15 254:24	371:2,13	176:1 177:19	277:7 282:1
320:19 323:14	264:22 265:1	373:19 374:10	177:19,20	<b>participation</b>
326:16 350:5	269:10 327:12	374:14,17	185:23 188:12	360:20
357:10 383:23	327:15 389:3,6	379:7	191:7 215:9	<b>particular</b> 213:9
<b>organized</b>	389:21,23	<b>PACs</b> 202:19	231:17,18	333:2

Edward Martin, Jr.

June 4, 2019

Page 426

<b>particularly</b> 190:24 353:17	<b>paying</b> 140:14 156:5 166:20	112:17,19 119:13,20	197:3 <b>perform</b> 140:3	92:4,7,11,13 92:15
<b>parties</b> 79:21 393:12,15	167:5 168:23 170:15	121:23 123:1,6 123:17 149:15	184:9 344:20 <b>performed</b>	<b>PHILLIPS</b> 6:18 <b>phone</b> 81:2
<b>partly</b> 125:12	<b>payment</b> 169:11 259:9 379:10	152:20 154:16 157:16 164:15	370:7 <b>performing</b>	109:21 110:4,9 110:14 218:16
<b>Partners</b> 170:6 170:10	<b>payments</b> 71:20 72:9 73:5	165:20 167:18 170:20 178:21	189:11,17 191:8,9 193:2	218:22 229:19 291:16 339:21
<b>Partnership</b> 371:21	128:15 335:11 367:19	179:3,9,13,15 179:24 180:5,9	<b>period</b> 39:20 81:6 94:3	343:17 <b>phrase</b> 37:14,18
<b>parts</b> 60:14 349:12	<b>peace</b> 173:1 <b>penalty</b> 390:10	180:11,14,17 181:8 185:18	128:17 162:10 212:13 220:19	37:21 38:8 62:21 160:14
<b>party</b> 156:8 172:7,11	<b>pending</b> 5:18 7:6 133:5	196:14 198:4 213:14,15,16	220:21 223:12 <b>periodic</b> 83:23	245:20 259:4 376:8
175:19 190:6 292:21	<b>Pennsylvania</b> 140:15 162:10	213:17 217:4 225:9 227:6,8	225:13 <b>periodically</b>	<b>Phyllis</b> 1:10 5:5 5:20 7:5 8:20
<b>Pasco</b> 174:1	162:11,12,15 163:3 164:16	228:3,8 233:21 234:22 243:18	283:19 <b>perjury</b> 390:10	9:5,14,24 10:24 11:12
<b>passed</b> 112:11 113:6 146:19	164:21,23 165:3 207:4	248:8 258:7 260:12 269:19	<b>permission</b> 55:7 55:11 345:3	12:9 13:11 14:5,7,15
181:5,5 331:12 367:22	353:16 355:17 370:1 376:18	274:9 275:5 279:15,17	346:9 381:1,6 381:9,14,20	21:15 22:9 24:7,12 26:22
<b>passing</b> 54:16	386:6,7 <b>Pennsylvania-...</b>	284:5 286:3,14 286:23 287:3,4	383:18 <b>permit</b> 89:2,4	27:3,16,18 28:1,9,19 29:8
<b>paste</b> 387:18	369:18,21 <b>people</b> 10:10	287:19 288:7 307:16 309:12	90:17 91:1,5 <b>permits</b> 92:1	30:10 31:5,14 33:13 34:1,4
<b>Paszkiewicz</b> 7:10,12	25:7 26:22 27:5,8,11,17	311:8,19,21,22 317:3,9 319:7	<b>person</b> 20:17 49:18 100:23	34:18 35:22 37:8 38:24
<b>Pat</b> 339:5,16,23	27:20 28:9 29:6,7,23	324:10 327:1 329:18 331:6	106:23 109:14 112:23 123:18	40:16 41:23 42:6,10 43:21
<b>patent</b> 380:20	30:13,18 31:1 31:3,4,7,10	355:19,20 356:1 358:15	150:12 184:23 263:6 286:8	44:1,3,10,21 46:9 47:8,16
<b>patented</b> 212:17	32:7,18,21,21 33:13 37:7,16	364:14 366:1,4 366:6 376:20	343:6 352:20 355:15 359:8	48:6,12,20 49:6,10,16,16
<b>patents</b> 333:4	37:20,22 38:11 40:11 41:15	377:3,19 383:17 384:4	<b>personal</b> 186:8 186:21 199:12	49:23,24 50:7 50:7,18 51:3
<b>patting</b> 377:11	44:15 61:21 63:2,11 64:17	385:2 <b>people's</b> 31:14	293:16 374:23 <b>personally</b> 293:8	51:11,17 52:7 52:11,19,23
<b>Paula</b> 358:6	67:8 68:10 71:13,16,17	354:9 <b>percent</b> 43:4	<b>Pfeifer</b> 187:4 195:13,17,21	53:4,9,14,20 54:2 55:1,18
<b>pausing</b> 48:17	78:11,22 79:9 86:7,16 87:3,7	<b>percentage</b> 63:14	196:1 368:14 368:16	55:22 56:8,10 56:16 57:2,13
<b>pay</b> 63:11 69:9 69:15 126:9	87:9 91:11,12 94:1 106:2	<b>percentages</b> 219:13,15	<b>philanthropic</b> 91:20	57:18,23 58:16 59:9,18 61:2,5
135:1 138:23 140:7 141:6	111:24 112:1,3	<b>perfect</b> 196:3	<b>philanthropy</b>	65:8,11 66:4

Edward Martin, Jr.

June 4, 2019

Page 427

66:16,21 67:11	126:16 127:1	198:20 200:1	281:15,19,19	364:13 365:19
67:19 68:16,24	127:15,20	200:24 201:3	281:21 284:22	365:24 366:2,8
69:8,18 70:2	128:1,4,9,10	202:16,18	284:24 285:3	366:13 367:23
70:12 71:2,8,9	128:11,11,15	205:17 206:8	285:18 286:3	368:21 374:8
71:11,20,21	130:3,7 135:14	206:23 208:9	286:12,17,23	379:3,10
72:6,10,14,19	135:20 136:1	209:11 210:10	287:14,19	380:15,19,20
72:24 73:6	136:16 137:2	210:14 211:6	288:2,5,10,16	381:6,12,13
75:19 76:6,23	138:19 139:24	212:18 213:8	288:18,19	383:16 385:6
77:9,13,21,24	140:3,7,13,20	215:20,23,23	289:2 290:7	391:2
78:5,10,15,18	141:5,19,21,24	216:13,24	294:23 295:13	<b>Phyllis'</b> 23:2
78:23,24 79:13	142:22 143:3,5	217:9,14	295:19,23	27:20 33:17
79:15 80:3,4	143:15 144:9	219:15 223:7	296:7,13,19	34:1 37:15,23
80:10,16,21	144:15,22	223:21 224:9	298:2,10,22	40:2 54:6,15
81:1,11,12,19	145:4,17,22	224:21 225:6	299:3 300:1,18	55:2 62:5
81:22 82:7,11	146:17 147:2,5	225:15 226:1,3	304:6,12,15,18	65:19,24 71:16
82:24 83:4,6	147:14,20	226:11,19	305:2,4,16	80:18 87:4
83:10,15,20	148:3,4,7,19	227:3,5,17,24	306:22 307:7	89:20 90:10
84:3,5,17,21	149:11 150:21	230:8,19 231:5	307:13,18,19	94:1 103:3,4
85:4,15,21	150:23 151:19	231:10,19	307:22 308:16	111:20 171:11
86:3,10,18,19	151:22 152:4	232:18 233:9	308:22 309:2,7	181:9,23 182:3
87:1,10 88:21	152:18,23	233:17 234:18	309:10,13,15	184:24 197:11
89:17 90:2,9	153:3,10	235:2 236:6,15	309:22 310:10	197:13 200:12
90:12 91:10,16	155:12 156:15	237:7 239:4	310:17 311:7,9	209:2 216:17
91:19 92:3,10	158:3,14,24	241:10,17	311:17,19,22	216:20 217:16
92:23 93:6,14	159:4 162:5	244:3 245:19	313:4,19	218:12 223:10
93:23 95:9,18	163:21 164:22	249:6 250:12	317:10,16	224:19 241:15
96:1 97:21	165:1,22	254:12 255:5,9	321:7 322:21	244:12 248:15
98:21 99:24	166:21 167:5	255:10,15,20	323:19 324:2	260:11 264:8
100:2,7,20	167:24 168:12	256:9,10,21	325:7,12,15	264:16 279:14
103:1,5 104:11	168:15 169:1	257:8,20 260:6	327:21 328:9	286:8 310:21
104:20 105:9	170:6 171:10	260:9,18	333:10 337:22	317:3 329:2,2
105:15,21	171:15 178:15	261:11 262:2,9	338:2,3,4	333:2 338:20
106:12,15,22	178:23 179:4,7	262:9,12,20,24	339:17 340:15	348:19 357:10
106:22 107:11	179:9 180:12	263:5 264:8	341:6,23	357:15 363:18
107:17,20,22	180:15,24	265:10 267:16	342:19 343:4,9	364:17 365:10
108:1,7,18	181:2,10	270:11,18,21	345:1,4,21	374:21 376:12
109:7,13,19	182:23 183:5	271:14 272:4,9	346:3,7,19	376:12
111:21 112:4	184:2,2,2,4,18	272:22 273:4	347:1,5,7,10	<b>Phyllis's</b> 27:11
112:10,16,19	184:22 185:1,1	274:3,20 275:8	348:21 349:1	30:10
113:2,6 117:20	185:4 187:10	275:16,21	349:17 352:8	<b>physician</b> 40:4
121:10 122:11	189:11,15	276:6 277:8,24	352:13,17	<b>picked</b> 28:19
122:16 124:2,6	191:10 192:4	278:10 279:2,3	353:4 354:17	175:10
124:24 125:5	193:6,23,24	279:6,7,12,23	354:24 355:7	<b>piece</b> 310:11
125:18,23	195:1,20,23	279:24 280:5,9	358:5 361:3,5	<b>pieces</b> 23:14,19
126:6,9,10,14	197:17,21	280:15 281:1,6	362:9,12	36:20 38:14

Edward Martin, Jr.

June 4, 2019

Page 428

66:9 266:18 <b>pin</b> 52:13,20 249:2,3,11 <b>pioneer</b> 117:20 <b>pitch</b> 349:8,9,13 352:16 354:22 356:13 <b>pitching</b> 349:10 <b>place</b> 7:13 29:8 77:17 110:19 137:24 248:16 262:16 301:9 <b>placed</b> 138:13 <b>places</b> 50:16 164:13 333:5 <b>Plaintiff</b> 6:6 8:16 <b>Plaintiff's</b> 2:5,6 2:7,8,9,10,11 2:12,13,14,15 2:16,17,18,19 2:20,21,22,23 2:24 3:4,5,6,7 3:8,9,10,11,12 3:13,14,15,16 3:17,18,19,20 3:21,22,23,24 4:4,5,6,7,8,9 4:10,11 14:18 25:12 38:16 88:8 94:4 115:15 120:4 129:13 137:13 139:15 141:10 148:9 149:20 152:8 159:21 161:15 166:9 168:3 169:23 186:23 195:5 203:7 206:10 219:22 235:12 247:9 254:15 268:14 282:10 289:20 294:8 310:2 313:8	321:12 327:3 337:16 340:22 347:17 359:1 368:4 384:11 386:10 389:7 <b>plaintiffs</b> 1:6,17 5:3,20 6:1 8:2 8:7 37:1 <b>plan</b> 20:12,20 21:10 22:1 179:16 220:3 220:12,18 223:17 282:1 310:19,23 311:1,2 351:23 352:1 357:9 358:5 373:9,21 386:15,18 387:2 388:4 <b>planned</b> 24:13 <b>planning</b> 21:4 89:7 387:24 <b>plans</b> 22:7,11 89:11 193:16 202:17 278:12 282:4 326:21 386:19 <b>play</b> 183:9,10,13 183:14,16,18 183:22,24 184:3,4 281:22 352:18 362:7 365:1 <b>played</b> 261:2 340:10,13 346:13 371:17 <b>playing</b> 184:6 <b>plays</b> 59:11,16 181:21 183:19 <b>pleadings</b> 186:2 186:9 <b>please</b> 7:15 8:4 378:23 384:19 <b>pleased</b> 377:4 <b>pledge</b> 138:3	<b>plenty</b> 311:18,20 <b>plot</b> 290:16,18 <b>plotting</b> 290:21 <b>pockets</b> 229:1 <b>poem</b> 25:23,24 <b>point</b> 12:22 30:9 37:19 45:22 58:24 77:19 84:16 86:11 87:4 98:4 105:22 106:22 141:9 146:13 164:13 176:7 183:7 196:15 203:24 238:7 260:14 263:21 275:3,7,12 288:5 313:16 316:24 317:2 351:15 354:9 356:12 361:1 363:9 <b>pointed</b> 225:12 <b>points</b> 326:21 <b>policies</b> 106:2 198:12 201:7 201:19 202:5 338:22 377:18 <b>policy</b> 162:3 234:21 <b>political</b> 74:19 78:2,6 79:14 79:19 80:12 91:2 139:11 162:3 290:5 376:10 388:22 <b>politically</b> 265:23 266:8 <b>politics</b> 11:2 12:11 213:18 338:22 354:8 354:10 <b>popular</b> 101:20 <b>portion</b> 200:12 <b>position</b> 30:18	50:19 181:17 181:18 186:11 261:17 262:15 288:1 383:10 <b>positioned</b> 108:14 <b>positions</b> 94:2 106:1 163:24 213:2 <b>possibilities</b> 31:4 84:7 <b>possible</b> 101:14 138:1 197:3 287:1 293:7 361:15 <b>possibly</b> 79:15 100:23 102:19 <b>Postal</b> 88:19,23 <b>posted</b> 248:8 <b>poster</b> 156:9 157:9 <b>potential</b> 118:2 190:21 372:2 372:11 <b>Pound</b> 33:7 <b>pounding</b> 291:15,20 <b>power</b> 216:17 286:7 <b>practical</b> 50:24 <b>practice</b> 78:11 109:1,4,6 148:7 173:2,4 173:5,8 174:9 174:11,17,18 175:4,6,11 176:12 196:4 <b>practices</b> 383:12 <b>practicing</b> 175:2 <b>precinct</b> 213:18 <b>predate</b> 241:4 <b>predecessor</b> 75:19,22 76:17 <b>preference</b> 346:11 375:18	<b>preferences</b> 234:21 <b>preferred</b> 295:8 <b>preparation</b> 362:8 <b>prepare</b> 344:24 389:15 <b>prepared</b> 24:13 72:22 125:21 143:13 206:22 220:4,12,24 221:17 348:5 359:11 360:10 370:10 <b>prepares</b> 68:12 <b>preparing</b> 220:16 360:2 <b>presence</b> 305:24 306:4,8 <b>present</b> 6:21 106:15 303:21 317:11 320:18 331:15 349:17 349:21 <b>presented</b> 317:20 <b>presently</b> 67:3,6 <b>preserve</b> 186:11 <b>preserving</b> 214:10,12 <b>president</b> 48:10 48:18 51:4,13 112:21 135:8 135:12 146:23 150:20,23 164:1 169:4 176:5,8 192:3 192:5 197:5 215:10,16 218:6 221:20 224:13 225:20 229:4 230:17 231:3 234:10 237:18 238:8 238:10,18
---	---	---	--	--

Edward Martin, Jr.

June 4, 2019

Page 429

239:12,13	88:8 94:4 99:1	<b>priority</b> 278:8	<b>process</b> 37:7	106:1 243:10
241:20,24	113:15 115:15	<b>Priscilla</b> 336:2,8	62:23 82:17	248:13,21
242:8,14 243:5	120:4 129:13	<b>private</b> 174:10	91:9,11 117:1	<b>promoting</b>
243:9,13	137:13 139:15	174:16 175:3,6	117:11 217:17	248:23 263:21
252:11,18	141:10 148:9	244:18 294:3	275:10 329:12	<b>Promotion</b>
261:21 263:23	149:20 152:8	<b>privilege</b> 130:22	354:8	348:5,17,24
263:24 270:7	155:1 159:21	131:10 132:1,7	<b>produce</b> 100:13	<b>proper</b> 157:5
276:18 285:16	161:15 203:7	<b>privileged</b> 56:12	101:13	367:7
296:5 303:6,13	235:12 245:9	56:12	<b>produced</b> 5:10	<b>properly</b> 141:8
303:21,23	247:9 297:18	<b>pro</b> 175:10	8:15	<b>properties</b>
308:23 310:13	310:2 313:8	<b>pro-Cruz</b> 317:6	<b>product</b> 43:9	345:15
310:15 318:8	321:12 327:3,7	<b>pro-family</b>	<b>productive</b>	<b>property</b> 57:3,5
330:7 337:22	332:3 337:16	201:6,18	384:21 385:19	57:10,14,24
338:2 339:17	340:22 342:10	213:14	<b>professional</b>	58:3 61:10,15
339:24 340:2,3	347:17 359:1	<b>pro-life</b> 175:10	193:21 194:18	61:20 199:16
340:9 346:12	385:9	213:13 271:8	<b>profound</b>	214:7 236:8,8
362:8 367:17	<b>primarily</b>	380:20	312:10	345:8,12,20,22
375:16	217:11 225:15	<b>pro-Trump</b>	<b>program</b> 219:19	346:1,3,4,6,10
<b>president's</b>	252:5 324:3	264:17	252:5 350:4	382:20 383:11
111:14 270:10	<b>primary</b> 219:8	<b>probably</b> 25:7	356:23 357:24	383:18
<b>presidential</b>	219:10 328:11	48:1 57:16	358:3	<b>proportional</b>
222:1 286:10	328:18	58:19,24 62:9	<b>programs</b>	190:19
325:1	<b>principal</b> 205:20	62:10 64:3	202:17	<b>proposal</b> 316:1
<b>presidents</b>	206:2,4,7	79:3,22 84:24	<b>progress</b> 331:6	326:15 348:1
207:24 232:9	302:7,10,14	85:9 87:12,13	<b>project</b> 29:20	<b>proposed</b> 256:5
251:11	<b>principles</b>	91:17 103:19	114:9,10,15,15	256:12 269:10
<b>press</b> 31:8,10	210:12,23	142:19,21	115:7 116:2	277:3
327:19 343:9	211:10,21	147:22 213:22	118:9,20 160:8	<b>proposing</b> 322:2
343:13 371:18	212:7,10,22	217:1 239:2	160:12 162:14	322:22
<b>pressure</b> 100:20	213:12 245:4,8	258:8 286:2	163:2,12	<b>prospect</b> 388:10
<b>pretty</b> 93:10	<b>print</b> 335:7	302:1 305:4	164:23 165:15	<b>prospecting</b>
143:4 157:8	<b>printed</b> 96:15,20	308:9,24 349:4	170:7,16 222:1	217:8 225:14
245:19,22	<b>printing</b> 126:18	355:12 360:7	331:21,24	<b>protect</b> 204:3
311:23 375:1	334:20 335:5	363:10	334:16 348:5	205:3,9 328:4
389:13	<b>prior</b> 21:9 22:1	<b>problem</b> 60:14	348:17,24	328:13,22
<b>prevent</b> 266:21	22:20 32:9	152:6 262:9	369:18,21	<b>protecting</b>
267:4,21 268:8	74:1 88:12	331:13 379:1,2	385:18	213:14 327:21
353:24 378:4,9	89:10,16 132:6	<b>problems</b> 36:19	<b>projects</b> 70:11	328:12,17
<b>prevented</b>	226:24 239:20	276:7	70:15,19	329:16 330:3
292:13,16	259:21 283:21	<b>procedure</b> 59:1	165:24 234:21	330:13,19
<b>preventing</b>	337:20 359:5	<b>proceed</b> 56:16	376:18 386:3,7	331:3,7,16
376:23	367:3,8 383:12	90:22	<b>prominent</b>	333:1,13,19,23
<b>previous</b> 91:17	387:5,5,8,13	<b>proceeding</b>	163:21	334:8,22
347:21	387:15	186:14	<b>promote</b> 80:19	335:22 336:16
<b>previously</b> 73:21	<b>priorities</b> 375:19	<b>proceeds</b> 200:6	92:6 103:5	343:19



Edward Martin, Jr.

June 4, 2019

Page 430

<b>protective</b> 55:24	96:15,20,24	<b>publisher</b> 208:9	82:14,16,20	311:23 389:1
<b>proud</b> 186:4,6	97:5,7,15,16	<b>publishing</b>	86:23 90:6	<b>quickly</b> 108:10
377:16	97:24 98:3,8	90:13 102:20	91:4 92:16,18	<b>quite</b> 327:2
<b>proudly</b> 365:18	114:15 118:1	379:14,23	93:10 95:2	365:19
<b>prove</b> 201:4,16	118:10 129:9	380:4 383:1	107:19 111:11	<b>quo</b> 269:22
<b>provide</b> 122:15	139:12,14	<b>pulp</b> 101:12	120:19 123:10	<b>quote</b> 45:18
124:3 139:12	150:8 151:9	<b>punks</b> 163:23	126:3 128:23	65:15 130:4
141:18,23	191:7,18 198:8	<b>purchase</b> 161:4	131:17 132:23	267:20 273:22
143:10 161:23	198:15 199:5,9	367:19	133:4,5 136:7	328:8
162:5 231:23	261:8 297:22	<b>purchased</b> 161:8	146:14 167:2	<b>quoting</b> 20:17
234:11 333:12	298:22 299:8	<b>purchasing</b>	167:13,17	45:14
380:2	301:19,23	249:13	178:14 180:2	
<b>provided</b> 68:16	302:8 306:12	<b>purpose</b> 46:6,10	181:14 182:11	<b>R</b>
84:8,10,13,17	306:24 309:4	47:5 210:22	182:18 185:8,8	<b>R</b> 6:1,17
84:21 94:23	312:4,13 313:2	212:4 328:2	187:20 188:3	<b>radio</b> 193:15
109:21 139:13	322:3 327:7	<b>purposes</b> 95:15	192:9 194:5,9	248:18 251:19
141:20 142:1	338:9 340:3,14	153:23 210:12	194:12 201:24	251:19,20,22
143:2 209:17	342:17 344:20	211:9,21 212:9	210:3 216:7	252:5,6,7,10
210:5 251:13	347:15 375:3	212:22 215:1	225:16 226:4	252:13,20
290:12 343:12	375:16 376:6	245:4,8	230:6 242:24	340:17
381:12,14	376:15 377:22	<b>pursuant</b> 238:11	253:19 264:14	<b>raise</b> 215:20,24
<b>provides</b> 46:3	378:13,18,21	<b>pursuing</b> 318:23	266:12,14	217:5
210:16	378:24 379:6	318:23 321:7	271:7 279:20	<b>raised</b> 64:12
<b>providing</b> 128:3	383:20,21	<b>push</b> 138:6	279:21 280:22	217:13 218:14
282:23 283:14	386:20 387:2	338:22	283:1 286:1	225:7 230:8
<b>PS</b> 46:5 181:11	<b>PSAEPAC</b>	<b>pushing</b> 100:14	287:8 288:15	356:22 361:11
215:7 338:3	151:6	101:3 311:21	316:10 325:3	363:5,14
370:17 371:2	<b>PSR</b> 181:10	<b>put</b> 14:5 30:2	332:16,23	<b>raising</b> 218:13
374:13 375:3	216:14	35:22 59:15	334:7 335:9	<b>rally</b> 165:18
375:18 379:15	<b>Ptc@riezman...</b>	77:5,16 92:9	338:16 347:3	386:5
382:4,10,19	6:13	112:22 134:24	354:7 359:14	<b>ran</b> 122:4
383:11	<b>public</b> 90:18	170:19 221:13	361:16 367:12	<b>Randy</b> 74:21,21
<b>PSAE</b> 6:10 7:18	93:19 108:10	280:19,21	370:22 373:17	74:24 75:4
7:22 14:1,3,6	125:14,19	282:14 307:7	378:6 389:14	79:7,7
14:13,15 21:6	158:6,9 196:19		<b>questioned</b>	<b>range</b> 177:6
21:15 58:14	204:17 244:18	<b>Q</b>	375:14	197:13 252:3
59:16 61:16,19	293:16 352:10	<b>question</b> 9:21	<b>questions</b> 2:1	<b>rate</b> 155:22
61:21,22 62:4	353:2	10:15,17 11:21	57:21 82:17	<b>rates</b> 91:5
62:8 63:15,20	<b>publication</b>	11:23 12:2,4	190:5,13 192:7	<b>Ray</b> 51:4,13,19
63:23 64:8,12	382:4	13:8 18:8	240:16 251:18	74:13 75:2
64:14 65:18	<b>publicly</b> 43:8	19:22 20:4,7,9	283:7	87:17,19 88:1
66:1 68:13	381:15	27:6 35:1 36:5	<b>quick</b> 34:24	88:3,15 91:13
70:19 72:5	<b>publish</b> 89:23	62:13 68:2	73:15 74:7	91:15 92:19
89:4,6,11	<b>published</b> 380:9	69:4,7 76:11	81:24 240:12	94:18,24
94:12 95:5,8	380:13	76:12,21 79:23	264:20 274:6	113:22 120:12



Edward Martin, Jr.

June 4, 2019

Page 431

121:24 129:22	392:11,12,14	392:10,11,13	198:13,17	334:19 336:22
139:22 143:24	392:15,17,18	392:14,16,17	200:8,16	337:2,10
144:7 148:13	392:20,21	392:19,20,22	220:14,17	<b>received</b> 35:5,8
148:17 150:19	<b>readers</b> 217:4	<b>reasons</b> 100:10	221:15 228:17	71:20 72:9
154:14 155:10	<b>reading</b> 24:24	263:10 350:13	239:23 240:21	73:5 164:9
299:20 303:2	28:24 35:14	<b>recall</b> 15:11	241:13,14,19	169:16 224:3,9
304:22 306:22	201:10,11	17:21 20:23	246:23,23	224:24 225:21
342:21	204:20 270:2	21:7 23:20	247:5 253:24	226:8,11,12
<b>Ray's</b> 119:23	328:8 338:16	24:5 29:9 30:4	256:7,16	227:9,13,17,18
<b>RDR</b> 6:23	357:5 382:24	30:6 31:19,20	258:12,21	227:20,23
<b>RDR/CRR</b> 8:9	391:3	31:23,24 32:11	259:23 261:16	229:22 230:2
<b>react</b> 32:21	<b>reads</b> 17:4	34:14 39:5,7,9	267:14 272:15	243:14 312:2
<b>reaction</b> 17:18	304:24	39:16 49:4	276:1,2 277:1	323:22 341:16
17:21 256:17	<b>ready</b> 99:6	50:9,20,23	277:3 281:23	341:19 363:5
<b>reactivated</b>	103:11 107:8,9	52:1 55:15	282:9 284:1	389:11
388:7,8	166:14 254:23	63:18 64:13	287:22,23	<b>receiving</b> 23:15
<b>read</b> 15:6 16:12	271:16 276:21	86:1,11,16	288:4,12	24:9 189:15
17:9,10 20:9	277:10 278:1	88:21 89:13	290:19,20,22	<b>recitations</b> 26:8
23:16 26:6,18	280:10 281:2	94:15,17 96:22	295:16 297:8	<b>reckless</b> 292:20
38:20 43:10	<b>real</b> 27:13 58:3	96:23 97:4	299:7 300:9	<b>recognition</b>
46:7 130:5	61:10 74:7	98:7,9,11,20	305:3 307:4	246:1
187:5 194:8,9	81:24 240:12	101:6,9 102:3	309:9 312:7	<b>recognize</b>
203:15 204:8	264:20 277:19	102:4,7,21	315:9 317:15	108:22 203:18
204:15,24	357:9 388:24	103:15,24	330:4 331:13	203:22 247:17
207:9,13	<b>reality</b> 312:8	105:5 106:14	333:14,17	247:19 360:7
208:14 211:14	<b>realize</b> 238:15	106:20 109:20	335:20 340:5	360:22,24
223:23 231:1	<b>really</b> 36:20	114:7,19	342:7 343:17	<b>recognized</b>
254:20 255:6	169:9 170:21	117:20 118:5	343:24 348:7	311:23
257:6 266:3,18	217:10 224:19	118:15 121:1	349:3,16 353:5	<b>recollection</b>
268:24 271:17	226:4 248:6	124:11,15,18	358:9 360:15	18:23 24:20
284:11 285:21	275:16,21	125:2,8,16,19	361:13,15	47:21 67:22,24
292:7,22	281:17 331:1	130:10 142:24	362:10 373:5	96:19 113:14
293:16 298:13	342:8 346:15	145:3,15,16,21	374:4,7,10	156:6,22
316:7 323:22	353:16 360:15	146:21,21	375:5 376:3,4	158:21 189:20
324:5 326:13	370:6 385:4	147:17,18	376:16 379:1	341:12
327:23 332:7	<b>Realtime</b> 393:5	149:1,14,16	382:8,9,15	<b>recommend</b>
338:7 341:10	<b>reason</b> 101:17	157:11,12	384:23 388:14	137:24 378:18
349:6 370:10	108:13 151:11	161:3,6 162:13	389:17	<b>recommendati...</b>
373:11 375:19	151:11 279:19	162:16,18	<b>recalling</b> 51:20	291:1
376:21 389:19	300:9 345:7	163:14,17	156:23	<b>reconsidered</b>
390:2 391:6,8	391:7,8,10,11	164:4,11 166:2	<b>receive</b> 128:3	132:9
391:9,11,12,14	391:13,14,16	169:18 170:17	179:20 199:3	<b>record</b> 7:2 26:2
391:15,17,18	391:17,19,20	177:9,17,18,22	199:24 200:21	71:24 72:3,22
391:20,21,23	391:22,23	181:4 197:15	228:2 325:10	73:17,20,22
392:2,3,5,6,8,9	392:2,4,5,7,8	197:19 198:10	325:17,20	88:9 94:5

Edward Martin, Jr.

June 4, 2019

Page 432

98:14,17 99:2	<b>reference</b> 30:5	142:12 167:13	189:19	23:6
113:16 115:16	32:3 71:1	168:24 197:10	<b>regard</b> 63:21	<b>relative</b> 393:14
120:5 125:11	74:20 75:18	257:12 258:2	206:7	<b>release</b> 327:20
125:14,20	92:23 93:5	271:11 274:17	<b>regarding</b> 16:9	343:9,13
129:14 134:24	151:6 208:8	281:13 295:15	16:15 55:17	<b>relevance</b> 30:22
137:14 139:16	210:14 249:10	295:17 338:10	56:9 64:8	185:24 190:1,5
141:11 148:10	250:11,16	346:4 350:21	72:23 108:7,18	190:11,17,19
149:21 152:9	255:15 295:2	352:13 357:3	109:18 113:2	192:17,22
155:2 159:22	295:22 322:12	358:17 364:11	150:19 199:5	198:21
161:16 171:20	323:12 324:18	365:22 366:4	261:6 338:6,14	<b>relevant</b> 63:3
171:23 194:24	325:24 350:3	369:23 370:3	383:20 386:3	186:9,12,14
195:4 203:8	353:3,3 364:4	371:11 374:3,8	<b>regardless</b> 77:19	191:20,22
230:12,15	364:8 365:12	374:11,18	229:6 236:15	199:17
235:13 247:10	368:21,24	375:22 376:14	<b>regions</b> 228:12	<b>relied</b> 91:11
264:21 265:1	372:2 376:23	384:8 385:23	<b>register</b> 114:8	119:21 215:19
297:19 310:3	377:2 388:10	387:8,16 388:8	238:6	217:11 218:7
313:9 321:13	<b>referenced</b>	388:11,18	<b>registered</b> 239:1	218:12 301:16
327:4,11,14	139:5	<b>refers</b> 23:23	393:4	<b>religious</b> 265:23
337:17 340:23	<b>references</b>	33:6 75:24	<b>registration</b>	266:9
342:11 347:18	354:13	88:18 94:11	114:1,6,14	<b>rely</b> 119:7,9
359:2 389:3,5	<b>referred</b> 59:14	95:1 96:9	116:2 117:1	154:17 219:4
389:21	91:17 116:3	113:24 166:15	118:9 235:21	367:12
<b>records</b> 84:24	128:6 167:21	166:16 167:1	238:1,12,19	<b>relying</b> 91:12
85:10,11,14,16	171:4,9 232:3	363:24	239:22 240:3	219:1
<b>recover</b> 39:11	232:17 233:2	<b>reflect</b> 64:11	240:20 241:9	<b>remain</b> 127:15
<b>recruit</b> 355:14	309:21 310:9	140:18 239:21	347:15	<b>remember</b> 18:22
<b>recruited</b> 309:4	329:21 351:18	<b>reflected</b> 116:2	<b>regularly</b> 38:9	21:24 49:16
352:22 388:7	365:15 384:1	140:4 171:13	229:4	51:14 59:14
<b>recruiting</b>	<b>referring</b> 13:24	236:4 238:12	<b>regulations</b>	67:16 70:22
352:10	18:3,16 19:1	282:1,4 303:12	116:24 118:3	89:8 103:19
<b>recruitment</b>	24:22 25:9	325:21	119:1,6	105:7 108:11
350:18 352:21	26:20 28:9	<b>reflects</b> 25:23	<b>related</b> 42:6	115:3 134:2
<b>Red</b> 319:3	29:16 33:10,15	141:3 301:11	50:15 94:2	160:13 162:19
<b>reduced</b> 393:10	33:21,24 34:4	<b>refresh</b> 16:23	168:8 187:10	189:9 193:4
<b>reed</b> 25:7	34:10,12,16	18:23 24:17,19	193:15 213:1,3	194:5,9 235:6
<b>reelected</b> 354:1	36:19 86:3	28:3 67:22,24	223:9 260:1	259:14 272:21
376:24	87:19 88:4,6	69:21 73:7,12	334:20 375:2	286:6,7 289:9
<b>reelection</b> 377:6	91:22 99:20	113:11,14	393:11	309:12 333:7
<b>refer</b> 82:6	107:16 111:19	156:23 158:20	<b>relates</b> 186:2	339:13 348:12
119:22,22	112:15 116:10	161:13 267:12	190:24	360:8 361:18
120:2 133:5	125:12 128:19	341:12	<b>relationship</b>	362:3 364:24
209:21,22	128:23 132:12	<b>refreshed</b> 55:16	84:2 193:24	365:8 375:1
248:8 271:24	132:15,18	86:21 118:15	195:18,19	382:22 383:5,6
363:18 364:16	133:10 134:7	170:18 258:5	366:2 369:11	383:13
371:19	134:19 138:18	<b>refreshes</b> 30:9	<b>relationships</b>	<b>remove</b> 353:24

Edward Martin, Jr.

June 4, 2019

Page 433

<b>removed</b> 366:19	181:23 182:3	<b>respective</b>	216:2 224:17	146:5 149:17
<b>renamed</b> 260:5	182:16,22	265:22 266:8	<b>revenues</b> 252:12	153:15,16,23
288:2	184:18	<b>respectively</b>	<b>review</b> 51:23	155:20 156:14
<b>renaming</b> 298:7	<b>represented</b>	205:7	283:24 343:14	158:5,12,18
<b>render</b> 390:6	131:12	<b>respond</b> 32:8	367:21	159:1 160:6,9
<b>renegotiate</b>	<b>representing</b>	90:8 131:18	<b>reviewed</b> 72:16	161:9 162:22
187:9	7:10,11 132:3	138:7 167:16	72:16 239:17	163:14 164:4
<b>Renting</b> 387:12	<b>Republican</b>	168:22 382:17	239:19 284:8	164:16 166:6
<b>repaying</b> 373:19	175:18	<b>responded</b> 316:9	361:13	166:23 170:21
<b>repeat</b> 15:24	<b>Republicans</b>	<b>responds</b> 32:17	<b>rhythm</b> 385:7	171:3,17
87:23	163:7	167:17 379:12	<b>Rick</b> 139:9	172:17 173:16
<b>repeated</b> 217:8	<b>reputation</b>	<b>response</b> 20:11	<b>RIEZMAN</b> 6:11	173:21 174:21
<b>replace</b> 253:1,7	244:7,12,16	23:10,15 24:9	<b>right</b> 9:1,2,7	177:11,21,22
254:13 265:5,7	245:7	27:16 96:10	12:1,4,23 13:1	177:24 178:3
323:9	<b>reputations</b>	98:20 256:17	14:10 15:8	181:4 182:4
<b>replaced</b> 51:19	265:21 266:7	275:13,23	19:4 20:4	184:8 187:10
51:21,24	<b>request</b> 136:3	276:2 278:6	23:20 24:15	188:18 189:18
<b>replies</b> 25:10	<b>require</b> 354:14	316:1,3,10,12	25:5 28:12	189:21 195:14
269:17	<b>required</b> 64:9	316:13,17	36:11 39:7	197:7 201:1
<b>reply</b> 96:16	125:13,20	321:22 389:15	40:5,12 41:14	202:7 203:2,5
269:17 366:21	212:18	<b>responsible</b> 40:8	47:9,22 49:4	207:13,15,18
<b>report</b> 180:12,15	<b>research</b> 285:9	124:5 135:24	50:19 51:5,8	209:18 212:8
181:11 208:10	289:12,17	166:20 167:4,8	51:15 52:1	218:21 221:1
215:7 250:12	<b>resent</b> 371:10	167:11 227:4,6	55:14 56:2,17	222:5,12
302:5,20	<b>reservations</b>	330:12 352:9	58:4,13 59:20	224:18 225:19
303:13 370:9	118:20	358:4 367:18	60:22 63:22	227:21 232:10
<b>reported</b> 371:13	<b>reservoir</b> 218:13	369:17	64:10 66:11	232:17 233:3
371:14,17	<b>resist</b> 328:5,23	<b>responsive</b>	67:16 68:2,23	234:5,8 238:3
<b>reporter</b> 5:16	<b>resolution</b>	32:19 64:17	71:23 74:22	243:8 245:5
6:23 7:11 8:4	145:23	<b>rest</b> 11:9 102:15	75:4,10 78:12	247:7 248:2
8:10 16:13	<b>resolutions</b>	211:14 268:21	79:16,17 81:22	249:18,21
88:1 93:4	146:20	278:13	82:8 84:18	250:3,8 251:1
167:4 230:1	<b>resolved</b> 382:14	<b>restrictions</b>	86:4,20 87:16	251:9,24 253:2
231:2 242:7	<b>resource</b> 117:12	178:3	88:11,19 90:23	255:11 259:8
250:13 392:23	<b>resources</b>	<b>restroom</b> 166:4	91:13 95:10	261:19,21
393:2,4,4,5,21	234:11	<b>result</b> 363:5,16	97:15 99:12,16	263:19 269:20
<b>reporting</b> 7:10	<b>respect</b> 34:24	<b>retain</b> 271:15	103:15 114:1	272:24 279:11
7:12 73:2	79:12 80:16	276:20 277:9	114:12,17	280:7,10
371:7	88:22 116:1	277:24 279:8	115:8 121:2	282:14 289:2
<b>reports</b> 17:7	149:8 171:1	280:1	122:17 123:13	297:5 298:9,16
64:7,9,10,11	184:5 342:16	<b>reticent</b> 287:15	123:14 125:16	298:17 299:21
363:10	343:2,8 354:17	<b>returned</b> 175:6	130:10,17	301:19 303:9
<b>represent</b>	359:18,20	<b>revenue</b> 64:8,12	131:23 132:3	304:23 305:5
247:15 270:17	360:17 363:1	72:24 199:8,15	136:5,15,16	305:13 306:1,2
<b>representative</b>	363:13	199:21,23	138:23 145:3	306:3 307:13

Edward Martin, Jr.

June 4, 2019

Page 434

308:11,20	129:22 268:22	S 6:1 126:17	272:15 279:13	356:7,18,19
309:23 313:7	<b>role</b> 59:11,16	<b>safety</b> 158:7,9	287:10 295:4	358:14 364:1,1
313:23 314:2,8	77:23 78:4	<b>saints</b> 82:1	316:20 339:8	365:11,20
314:9,20 315:1	79:12 80:2	<b>salaries</b> 197:21	352:22 374:24	367:1 370:4,6
315:5 316:22	91:15 181:21	<b>salary</b> 175:23	378:1 385:12	371:6 372:18
317:17 319:5	183:2,8,10,12	176:1,4 177:7	385:14	373:24 380:8
323:1 325:14	183:14,15,16	177:15 185:22	<b>says</b> 8:16 16:18	382:4 383:19
325:15 327:22	183:18,19,21	186:5,6,8,18	17:22 18:12	385:15 388:2,6
328:3 329:13	184:1,3,4,6,9	187:9,16,18	23:13,21 32:12	<b>Schattnik</b> 6:18
330:8,17	185:14 198:1	188:2,17	34:11 35:1	6:18 7:19,19
336:19 339:18	248:3,7 261:2	189:15 191:8	43:7 45:7 46:3	<b>Schattnik@g...</b>
342:21,23	281:22 346:14	192:10 197:13	75:5 77:3 82:1	6:20
343:14 344:10	347:14 352:18	197:17 198:9	87:17 88:2	<b>scheduled</b> 281:9
348:18 349:3	360:20 362:8	200:21,22	96:14,14 110:1	<b>Schindler</b>
351:19 354:16	<b>roles</b> 340:10,13	<b>same-day</b>	135:22 136:3	322:10,12
356:20 359:8	<b>roll</b> 341:7	299:16	137:23 151:18	<b>Schlaflly</b> 6:21,21
360:5 361:8	<b>Rolodex</b> 34:2	<b>sanctity</b> 223:19	151:18,21	15:4,4,4,5,13
362:3 365:13	<b>Roman</b> 221:24	<b>Sanders</b> 6:6 7:23	160:7,17	15:13,14,14
365:19 367:20	<b>room</b> 184:24	7:23 130:15	163:20 166:18	16:8,14 17:6
373:1 378:16	<b>rose</b> 22:11	131:6,7 132:19	167:15 176:24	17:12,22 18:3
383:11 385:21	<b>Rosemary</b> 93:12	134:20 157:20	184:16 195:16	18:12 19:16,18
386:5 388:13	<b>Rosina</b> 314:17	<b>Sandy</b> 314:6,23	205:11 206:24	19:19,24 20:12
<b>rights</b> 49:7	319:19	<b>sank</b> 376:20	207:20 208:8	23:11,11,12,12
52:12 53:5,21	<b>round</b> 271:12,13	<b>sat</b> 134:24	210:21 211:1	23:21 25:20,21
55:2 173:18	<b>Roy</b> 100:21	<b>Saturday</b> 25:21	211:12 212:2	25:21 28:10
199:17 214:7	<b>Royal</b> 172:5	251:23,23	221:18 251:4	30:16 34:18
<b>rigorous</b> 201:6	<b>royalties</b> 200:7,9	342:3	255:1,13 257:3	39:22 40:1,6
201:17	200:11,21	<b>save</b> 112:1	269:18 291:4,8	40:14,16,23
<b>ring</b> 35:24	<b>royalty</b> 200:18	<b>savvy</b> 257:4,11	291:15,18,22	41:2,3,8,21,23
<b>rings</b> 110:11	<b>rude</b> 284:5	262:23	292:2,19 293:2	42:5,9,13 46:3
<b>risen</b> 144:20	<b>rules</b> 119:1,5	<b>saw</b> 105:17	293:6,10,15	49:16,23,24
<b>River</b> 6:19	131:20	154:9 185:13	294:2 297:3	50:7 53:14
<b>RNC</b> 27:21	<b>ruling</b> 31:20	225:8 234:15	300:21,24	57:2,23 59:8
202:19 218:11	<b>rump</b> 292:20	238:14 258:8	301:20,22	59:17 60:20
223:6,6,8	<b>run</b> 19:17,19,23	360:7	315:21 322:8,8	65:15,16,17,23
224:12 308:3	43:17 138:1	<b>saying</b> 24:20	322:16 323:8	72:23 79:15,15
308:10,18	168:20 274:21	28:20 33:1	323:18,20	81:22 86:4,4
<b>road</b> 134:21	317:6 377:5	37:19 43:4	324:2 337:23	86:19,19 87:11
<b>robo</b> 371:7,12	<b>running</b> 43:10	86:22 87:15	337:24 338:17	87:11 94:11
<b>rock</b> 322:10	156:7	133:19 138:7	338:21 339:1	96:9 104:11,20
<b>Rockford</b> 386:4	<b>rushing</b> 104:8	142:2 153:17	341:6 343:15	105:9 112:16
386:6	<b>Ryan</b> 344:15,17	153:19 185:5	346:5 348:21	117:23 118:7
<b>Roger</b> 15:4,14	344:24	199:10 209:4	350:3,18	127:24 129:22
15:16 23:12		216:24 227:3,5	351:12 352:24	134:23 138:19
46:2,13,17,21	<b>S</b>	228:9 269:24	355:4,14,20	146:18 167:24

Edward Martin, Jr.

June 4, 2019

Page 435

180:12,15	345:5 348:22	91:19 92:3,10	195:2 217:14	99:8 140:19
181:10 184:16	352:9,14,17	92:23 93:6,14	233:9 255:10	157:22,23
187:10,15,19	354:24 365:19	93:23 95:10,18	255:16 262:20	188:15 194:13
187:22 188:1	368:12 369:7	96:1 98:22	275:8 276:12	204:15,22
197:18,22	369:15 372:13	99:24 100:2,7	279:3,3,6,7,23	240:13 250:10
198:20 200:1	374:8 379:12	103:1 105:16	280:1,6,9,15	295:7 342:6
201:1,3 202:16	380:23 381:12	105:21 106:12	281:1,6,16,21	350:2 351:12
202:18 206:23	381:14 382:9	106:16 107:11	288:5 290:7	352:7 369:13
206:23 208:9	382:17	108:7,18	295:13,23	379:18
210:10,14	<b>Schlafly's</b> 1:10	109:19 112:11	296:13 298:2	<b>secretary</b> 51:5
211:6 215:20	5:5,21 7:5 8:20	113:2 121:10	298:11,22	51:13
223:21 224:9	9:5,14,24 11:1	122:12,16	299:3 300:1,18	<b>section</b> 204:14
227:17 230:8	11:12 12:10	124:2,6,24	304:7,13,19	204:16,19,20
230:19 231:5	13:11 14:7,15	125:5,18,24	307:19 309:2,8	204:21,22
231:19 244:3	20:11 24:8,13	126:6,9,10,14	309:11,22	205:1 211:4
245:19 247:3	26:22 37:8	126:17 127:2	310:10,17	<b>see</b> 17:24 18:12
249:6 250:12	38:24 42:7,10	127:16,20	311:7,9,17	20:14,18 31:13
252:24,24,24	42:20 43:21	128:1,4,9,10	313:4,19	32:7,17,18
253:11,11,12	44:1,21 46:9	128:11,12,15	322:21 323:19	42:16 45:17
254:4,4,4,5	47:8,16 48:6	130:3,8 135:20	324:2 325:15	74:7,22 94:12
255:1,5,9,20	48:13,20 49:6	136:1,16 137:3	337:22 338:2,3	96:17 99:10
256:21 257:8	49:10 50:8,18	139:24 140:3,7	339:17 341:7	103:12 119:12
260:6 262:24	51:3,11,17	140:13,21	341:23 343:9	120:17,24
265:4,15,20	52:7,11,19	141:5,19,21,24	345:2 346:20	126:5,12 140:9
266:6,17,21	53:4,20 55:1	142:22 143:3	347:1,8,10	141:7 142:10
267:3,10,20	55:18 56:8,10	143:15 144:9	349:1,18 353:4	142:12 151:5,6
268:1,3,6,21	57:13 58:16	144:22 145:5	354:18 355:7	157:4 160:16
269:16,16	59:9,18 61:2,5	145:18,22	361:3 362:9,12	164:1 166:22
271:10,14	65:8,11 66:4	147:14,20	366:8,13	186:1,8 188:3
272:23,24	66:21 67:11,19	148:19 149:11	368:22 380:19	188:14,19
276:17 277:8	68:17,24 69:8	150:21,24	391:2	190:19 191:14
277:24 281:24	69:18 70:3,12	151:19,22	<b>schlafly.com</b>	197:8 198:6
285:1,18 288:3	71:2,8,9,11,21	152:4,19,23	110:2	201:12 204:9
288:19 294:23	71:21 72:6,10	153:4,10	<b>school</b> 173:17	207:5 208:1
296:7 304:9,15	72:14,19,24	155:12 156:16	201:9 202:6	212:5 223:5
305:2,16	73:6 75:20	158:4,14,24	<b>scope</b> 165:19	234:17 247:16
306:11,19	76:6,23 77:9	159:4 162:6	228:8	250:6,11,16
307:18,22	77:13,21,24	163:22 164:22	<b>Scott</b> 120:16,17	251:2 270:2
309:15 318:14	78:5,15,24	165:1,22	336:21	275:15,20
318:17,22	79:13 80:3,4	166:21 167:5	<b>screen</b> 247:21	276:13,16
321:19,20	80:10,16 84:17	168:12,15	<b>screw</b> 293:7	278:11 280:16
325:7,12	84:21 85:4,15	170:6 171:15	<b>screwup</b> 371:9	281:12 282:20
327:21 328:9	85:21 86:10,18	184:18 189:11	371:22	294:3,5 295:1
340:16 341:17	87:1 88:21	189:16 191:10	<b>second</b> 15:8	295:20 300:11
341:20 343:4	89:17 90:2	192:4 193:7	24:23 42:18	315:23 322:5,6

Edward Martin, Jr.

June 4, 2019

Page 436

322:7 323:10	32:10 89:2,2	106:4 111:18	379:11	310:5 312:8
326:3,5,9,12	126:8 143:24	112:10,14	<b>settling</b> 374:18	313:11 324:22
328:9 337:23	148:18 153:11	113:22 115:22	<b>Seven</b> 250:22	325:4,5,6
349:6 350:15	217:24 231:17	116:6 121:10	<b>seventh</b> 250:19	327:6 337:19
351:3,15	339:20 361:4	124:14 125:17	<b>sheets</b> 194:20,23	341:2 342:13
358:20 360:11	374:5,9	128:14,18	195:4	347:20 358:20
364:18,21	<b>sends</b> 23:11	147:13,21	<b>shift</b> 284:24	359:4 364:19
369:19 371:4	163:10	169:13 174:22	288:19	368:7 384:14
373:10,22	<b>sense</b> 27:13 68:4	197:24,24	<b>shifts</b> 213:16	386:13
377:5 379:13	119:13 164:7	271:17 276:22	<b>Shirley</b> 102:13	<b>showed</b> 302:16
379:15,23	178:20 179:24	277:11 278:3	102:18	332:12 372:20
380:1 383:23	194:2 208:15	281:7 349:24	<b>shit</b> 291:3 292:7	<b>shown</b> 113:13
387:6 389:12	348:10 349:12	<b>series</b> 15:3,12	293:12	356:23
<b>seeing</b> 25:11	351:9	140:5 256:20	<b>short</b> 73:18	<b>shows</b> 35:6
32:21 144:20	<b>sent</b> 15:16,22	298:1	98:16 230:13	300:4,17
168:17 225:11	16:8,14 25:20	<b>serious</b> 82:13,16	264:23 327:13	332:17
250:22 284:1	32:23 71:20	<b>serve</b> 351:14	389:4	<b>shut</b> 98:13
360:8 365:8	72:9 73:5 75:3	<b>served</b> 59:18	<b>shorthand</b> 8:9	<b>side</b> 35:2,3,17
<b>seek</b> 346:9	96:24 97:5,8	329:3	351:9	36:16 97:16
<b>seeking</b> 28:17	98:21 99:18	<b>service</b> 63:12	<b>shots</b> 247:22	292:3
87:19	124:18,21	88:19,23 235:9	248:1	<b>signature</b> 8:11
<b>seeking.</b> ' 88:3	149:12 152:20	236:3 299:16	<b>show</b> 14:21	94:19,24
<b>seen</b> 16:23 29:24	170:20 220:6	<b>services</b> 68:16	16:22 30:8	143:14 150:20
64:11 72:13,17	226:19 269:11	84:9,11,13,17	33:12 35:7	300:13 302:2
72:18,21	269:13 283:15	84:20 85:24	38:19 67:23	362:17
144:11 152:14	341:3 342:17	122:16 124:3	73:24 85:12	<b>signed</b> 230:19
166:13 232:4	342:18 345:1	128:4 139:12	88:11 94:7	231:4,19 362:4
235:23 284:2	348:2 361:8,14	139:13 140:2	99:4 113:18	<b>significance</b>
286:9 361:1	361:21 362:5	141:18,20,23	115:18 120:7	102:23 111:9
362:2 363:10	362:17,22	143:2,10	124:21 129:16	<b>significant</b> 31:17
<b>segment</b> 387:6	375:6 384:18	161:23 162:5	137:11 139:18	358:15
<b>selected</b> 329:20	386:21 387:3	282:24 283:14	141:13 148:12	<b>silenced</b> 87:6
<b>senator</b> 334:19	<b>sentence</b> 47:4	292:6 344:20	149:23 152:11	257:21
<b>senators</b> 196:13	92:7,8 204:15	370:7	155:4 159:24	<b>silly</b> 284:8
<b>send</b> 15:17 32:16	204:22 211:15	<b>serving</b> 263:23	161:18 166:12	<b>similar</b> 12:19
32:16 130:2	<b>separate</b> 90:6	<b>set</b> 25:9 71:16	168:6 170:2	20:13,21 21:10
140:14,24	110:14 231:13	72:6 100:6	187:2 191:11	21:13 22:3,5
219:20 229:4	248:22 262:11	144:20 165:20	195:8 206:13	22:21 165:17
230:18 231:4	263:11 334:5,9	211:22 261:6	220:2 235:15	193:24
231:10,18	387:6	274:10	247:12 251:19	<b>similarities</b>
295:7 316:13	<b>September</b>	<b>sets</b> 212:4,6	251:19,20,22	312:4
316:15,16	99:18 100:9	<b>setting</b> 99:21	251:23,23	<b>simple</b> 46:5
325:10,17,20	104:2,2,12,19	118:17 194:18	252:13,20	<b>simplified</b> 32:6
346:8 363:22	104:20 105:10	341:21	254:18 257:1	<b>simply</b> 208:11
<b>sending</b> 17:3	105:10,14,15	<b>settle</b> 374:13,16	289:23 294:11	365:19

Edward Martin, Jr.

June 4, 2019

Page 437

<b>Singlaub</b> 115:2 198:6	314:16,19,22 315:24 316:23	<b>site</b> 167:16,17,18 <b>sitting</b> 55:14	<b>solid</b> 322:10 <b>solidified</b> 377:19	146:7 148:11 148:23 149:7
<b>Singlaub's</b> 193:16,17	318:10,13,16 318:19 319:16	60:18 145:16 228:10	<b>solve</b> 276:6 <b>Solverud</b> 2:2 6:2	149:22 150:15 152:10 153:8
<b>single</b> 67:18 125:18	321:17 322:1,1 322:15 323:11	<b>situation</b> 85:3 <b>six</b> 5:13 31:11	8:1,1,19 9:13 9:19 10:4,14	155:3,19,21 157:21 159:11
<b>sinking</b> 377:12	324:6 325:16 326:14,17	36:21 37:1 183:7 255:2	11:11,20 12:8 12:16 13:9,23	159:17,23 161:17 166:5
<b>sip</b> 107:6	327:18 328:1 328:10 330:10	257:22 284:24 <b>size</b> 219:17	14:20 15:1 16:12 17:5,17	166:11 167:3 167:14 168:5
<b>sir</b> 16:5 37:18 38:3 71:7	332:5 334:24 336:14,23	<b>skipped</b> 137:15 <b>sky</b> 374:12	18:9,20 19:12 20:19 21:20	169:20 170:1 171:17 172:1
76:21 82:10,20 83:3 90:24	337:3,11,15 338:8,11 339:6	<b>slow</b> 201:14 <b>SLU</b> 172:16	22:13,19 23:9 24:6 25:14	178:6 184:15 185:3,9,15
91:23 92:9 110:7 120:20	341:5,11,14 344:16 346:21	<b>small</b> 73:10 383:21	26:13 36:1,22 37:17 38:18	186:4,10,15,16 187:1 190:2,8
172:18,20 173:7,15	347:23 348:19 348:23 350:16	<b>smart</b> 40:5,6,7 <b>smear</b> 291:2	39:8,18 40:13 40:22 41:13	190:12,16 191:1,6,24
176:19 197:9 207:7 208:2	351:16 352:6 353:10,12,14	<b>Smith</b> 314:14 <b>SMITHAMU...</b>	42:4 43:6,19 44:18 45:5	192:3,12,20 193:1 194:11
209:1,5,8 210:15,19	354:15 356:9 360:19 361:9	6:7 <b>SMPS</b> 120:11	46:16 47:1,7 47:15,23 49:22	194:14 195:7 199:1,6,11,14
212:20 214:8 215:14 221:8	361:12,20,23 362:18,21,24	121:3,17 122:15 124:9	51:2 52:18 53:3,13,19	199:20,22 202:2,11 203:9
222:6,10,13 223:24 224:15	363:3,7,15,17 364:6,10,21	140:2,8,24 152:17 158:24	54:4,13,21 55:9 56:7,18	203:13,20 204:11 206:12
237:2,23 249:15 250:18	365:11,14,17 365:20 366:15	159:3 <b>social</b> 219:2	57:1,8 62:14 62:19 73:14,23	208:17 209:23 219:7 220:1
252:14,22 253:4 255:7,12	366:23 367:1 368:20 370:12	242:3,5,10 <b>Society</b> 29:5	74:12 76:3 88:10 93:9	223:15 227:2 228:18 229:18
257:7 265:18 267:1 279:22	370:15 375:11 375:20 376:22	271:9 <b>solely</b> 201:23	94:6 97:22 98:12,19 99:3	229:20 230:10 230:16 231:15
283:9,12 290:4 290:14,17	377:1,8 378:6 380:3 383:3,24	215:18 <b>solicit</b> 229:13	104:18 107:1,7 107:18 109:16	232:7 233:12 234:2,16
291:7,14 292:1 292:4,9,12,15	384:17 387:4,7 387:14 389:12	231:19 357:13 358:5 366:12	113:17 115:11 115:17 116:18	235:14,18,19 236:14 242:13
292:18 293:1,5 293:9,14,18,20	<b>sit</b> 19:2 30:4 53:12 56:23	366:16 <b>solicitation</b>	117:5 118:6,23 120:6 121:15	244:5,14 245:1 245:13,23
296:24 298:24 299:14,21	59:3,20 63:22 67:17 68:19	218:20 357:24 358:3 359:7	123:11,23 126:4 129:15	246:4,12,19 247:1,11 253:5
300:12,15,23 302:3,9,12	70:10 72:12 73:10 78:21	<b>solicitations</b> 218:16,22	132:11 133:7 133:18 134:1,3	254:17 256:19 260:2,15
304:2,8,11,24 306:13,17	86:17 97:6 106:3 114:13	242:15,17 367:3,8	137:11,16,18 137:21 139:17	261:13 262:14 263:13 264:11
309:18,20 311:11,13	274:16	<b>solicited</b> 357:1,2	141:12 144:8	265:2,13 266:4
313:21 314:3				



Edward Martin, Jr.

June 4, 2019

Page 438

266:13 267:2	42:1 45:13,16	200:20 216:1	376:7 381:11	<b>sprinkled</b> 223:5
267:18 268:16	65:10 75:7	<b>South</b> 6:7,15,19	382:6,10	<b>St</b> 5:15 6:4,8,12
269:6 271:22	77:6 87:24	81:4	<b>specifics</b> 32:11	6:16 7:14
272:5 277:5,20	93:2,11 99:15	<b>Southeast</b> 207:5	34:8 114:19	66:15 173:19
278:15 282:12	110:23 116:21	<b>Southern</b> 1:2 5:1	124:11 146:22	207:22
287:17 289:22	150:5 151:7	5:19 7:7	147:18 157:11	<b>staff</b> 174:21
294:10,16,17	155:19 156:3	<b>sovereignty</b>	164:11 177:5	334:20
297:10,13,20	158:8 166:22	212:11,14,23	177:17,22	<b>staffer</b> 336:2
303:22 310:4	167:1 171:23	213:8,15	241:13 259:24	<b>stages</b> 163:19
311:5,14	204:20 212:3	222:11 324:4,8	267:13 345:23	<b>stamps</b> 74:2
313:10 315:11	213:5 229:24	324:13 388:1	384:23	<b>standard</b> 69:13
315:20 317:19	231:1,1 242:6	<b>sp</b> 337:13 356:3	<b>speculate</b> 36:13	<b>standing</b> 265:22
317:23 320:23	271:2 283:1	<b>space</b> 44:8	377:10	266:7
321:14 323:7	315:3 322:5	<b>speak</b> 182:17	<b>speculation</b>	<b>stands</b> 292:7
323:17 327:5	336:17 338:15	217:5 281:14	17:15 18:6	<b>start</b> 81:9 82:21
327:16 331:23	369:12 372:24	<b>speaking</b> 184:17	23:24 35:19	85:9 163:24
337:18 341:1	373:15,16	<b>special</b> 91:5	41:7 43:1,13	176:3,15 212:1
342:12 344:12	<b>sort</b> 34:17 54:3	112:7	44:24 46:13	255:4,14 263:9
344:13 347:19	58:23 62:5	<b>specialize</b> 175:8	87:22 93:1	279:19 307:15
359:3 367:16	66:19 72:21	<b>specializing</b>	116:12 123:20	313:22 330:21
368:6 370:23	88:24 93:22	111:12	126:1 144:2	341:8
371:5 372:9,17	97:15 104:7	<b>specialty</b> 59:11	153:6 208:13	<b>started</b> 21:15
373:2,14 376:1	108:16 112:7	<b>specific</b> 82:20	233:14 244:10	34:2 41:11
377:15 378:14	147:10 169:6	83:6 97:9	245:11,16	49:17 50:14
379:20 384:13	179:13 224:20	111:24 175:7	271:21 315:8	52:24 66:1
386:12 388:16	235:2 248:19	176:21 179:16	372:4	81:12 90:9
388:24 389:9	254:7 274:5	199:19,20	<b>speeches</b> 380:19	174:9 175:11
389:18	277:3 289:13	228:12,13	<b>Spencer</b> 5:14 6:2	175:22 233:24
<b>somebody</b> 34:7	334:16 349:7	265:12 300:9	7:13	259:15 279:5
40:14 63:17	352:1 366:5	320:16 381:14	<b>spending</b> 39:10	279:22 285:3
72:23 74:21	<b>sorts</b> 385:1	<b>specifically</b>	153:15 189:22	334:2 338:4,12
80:24 84:8,10	<b>sound</b> 185:7	33:14 37:9	193:6 195:1	<b>starting</b> 8:17
100:17 101:8	187:20 357:6	40:15 51:15	<b>spent</b> 333:19	89:1 223:8
101:15 127:19	358:22	56:3 81:16	385:5	<b>starts</b> 352:8
154:2 281:13	<b>sounded</b> 335:10	83:15 84:13	<b>spit-balled</b>	375:9
283:13 325:6	<b>sounds</b> 9:2 28:11	85:20 86:11	277:3	<b>startup</b> 174:18
354:11 355:17	32:15 51:15	89:13 102:17	<b>split</b> 188:24	<b>state</b> 5:17 7:15
<b>somewhat</b>	177:21 182:24	113:1 116:1	200:11,13	20:13,22 21:11
139:11	189:20 207:15	143:3 157:1,2	<b>splitting</b> 194:1	22:8,22 23:3,3
<b>sons</b> 40:2 41:17	207:18 213:21	170:17 176:17	<b>SPMS</b> 139:23	119:24 172:13
102:16	243:8,8,12	193:4 206:14	<b>spot</b> 196:11	174:13 201:8
<b>soon</b> 81:11	244:23 267:14	210:6 225:16	<b>spots</b> 196:3,5,17	202:5 205:5,21
153:14 323:21	296:2 312:14	226:5 241:12	196:23 197:3	206:5 207:24
<b>sorry</b> 9:18 13:8	<b>sources</b> 199:2,15	242:24 329:8	<b>spring</b> 81:6,10	231:23,24
16:11 33:22	199:21,23,24	341:22 348:12	81:15	232:8,9,12,15



Edward Martin, Jr.

June 4, 2019

Page 439

232:16,23,24	238:21 239:9	<b>strictly</b> 224:20	<b>successes</b> 358:2	122:1,7 123:15
233:7,19 234:4	313:22 314:1,4	<b>strike</b> 28:6 81:21	<b>successful</b>	126:12 151:2,4
234:12,20	314:4 315:4,7	92:21 95:8	243:23 244:4	151:15 152:6
251:8,11,16	315:13,13	102:24 122:9	357:23	153:1,5 154:22
271:15,20,24	318:22 319:2,6	124:4 181:17	<b>successor</b> 40:17	156:10 157:2
272:4,10,17	321:8 327:1	208:21 212:21	258:23	157:12 158:17
273:11,22	341:8 347:10	239:18 262:5,5	<b>sued</b> 31:11 46:6	160:22 373:19
274:21 276:20	351:13,21	276:10 295:10	311:19	374:10,14,17
277:9,24 279:8	354:14,19	318:6 357:5	<b>sufficient</b> 374:2	<b>support</b> 10:10
280:1 284:13	355:1,6,8,11	370:5	<b>suggest</b> 255:5,13	11:14,16,18
284:23 292:21	<b>status</b> 269:22	<b>strikes</b> 307:20	387:12	100:21 123:2
299:17 302:8	<b>stay</b> 22:9	<b>strokes</b> 193:9,12	<b>suggested</b>	163:4 164:1
302:13 304:22	<b>steal</b> 291:9	<b>strong</b> 31:14	269:20 350:4	215:13 234:12
305:8,14,17	<b>steer</b> 27:10 29:7	223:20 330:21	387:2	234:12 321:6
306:4,20	<b>steps</b> 70:23	<b>strongly</b> 288:1	<b>suggesting</b> 255:8	334:19 350:11
312:13,16,20	388:3	378:18	<b>suggestion</b> 291:2	356:20 384:7
312:24 313:1	<b>Steve</b> 269:20	<b>Strout</b> 79:2	<b>suggestions</b>	<b>supported</b> 26:22
313:18,19	270:4,6,16,22	119:12,15	282:22 283:5,7	28:9 61:21
314:14 319:3	271:6,11 276:4	<b>structure</b> 122:8	290:13	243:19
320:3,5,14,19	<b>stick</b> 271:12	<b>struggling</b> 254:1	<b>suggests</b> 160:5	<b>supporter</b>
323:9,13	<b>sticker</b> 282:14	<b>studies</b> 173:1	313:17	257:11 262:23
326:16 331:10	<b>stipend</b> 335:4,12	<b>study</b> 204:18	<b>suing</b> 109:12,18	<b>supporters</b> 10:2
332:3 334:18	335:15,19	<b>stuff</b> 17:3 101:1	<b>Suite</b> 5:15 6:3,8	10:6,9,21
337:21 338:2	336:8	117:17 179:18	6:15 205:21	29:24 31:12
338:23 339:17	<b>STIPULATED</b>	248:7,18 249:6	207:4 304:23	38:23 90:18
339:24 340:2,8	8:6	<b>subject</b> 9:11	<b>Sullivan</b> 86:12	218:8 243:15
341:8,22 347:7	<b>stop</b> 27:21 133:3	16:20 32:17	86:20 87:10	244:8 257:4
393:5,21	237:7 287:7	75:12,14,15,23	304:3 305:8,10	315:15 356:23
<b>stated</b> 12:1 87:5	330:22 333:7	93:8 166:16	313:15 316:5	364:5,8 376:12
211:10 220:22	384:20	246:20	316:21 318:11	<b>supporting</b>
342:1 354:24	<b>stopped</b> 340:5	<b>subscribe</b> 390:8	321:19 325:23	27:11 324:11
<b>statement</b> 35:16	<b>stopping</b> 222:21	<b>subscribing</b>	329:22 337:21	<b>supportive</b>
42:21 43:12,15	<b>strategic</b> 213:16	180:1 391:3	341:21 342:2	33:13
43:15 72:13,17	220:3,11,18	<b>subscription</b>	343:3 345:3	<b>suppose</b> 14:17
72:22 119:23	310:19,23	179:18 250:13	346:18 347:4	52:10 59:14
206:24 207:8	<b>strategy</b> 83:19	250:13	<b>sum</b> 335:10	216:5 228:22
301:21 339:2	<b>Street</b> 6:15,19	<b>subscriptions</b>	<b>summer</b> 44:2	229:2 241:23
<b>states</b> 1:1 5:1,18	205:21 206:5	180:6,9,12,14	104:4 360:4	<b>supposed</b> 226:13
7:7 88:19	302:8,13	180:18	383:16	349:1 350:6
224:5 225:1,22	304:23 305:9	<b>substance</b> 390:5	<b>super</b> 99:21,23	<b>supremacists</b>
226:9 227:14	305:14,17	<b>substantial</b>	99:24 100:1,5	222:21
227:21 228:4,6	306:4,20	210:11,22	103:7,17	<b>sure</b> 8:22 9:3
228:13,21	<b>stretch</b> 105:23	211:9 213:6	105:11 110:20	10:8 11:17
229:6 232:13	113:10 124:22	<b>succeed</b> 43:18	111:5,7,9	13:19 14:14
232:19 233:18	317:6	<b>success</b> 244:1	112:3 121:22	15:7,19 16:21

Edward Martin, Jr.

June 4, 2019

Page 440

16:23 20:10	127:14,23	272:21 273:1	138:18,24	84:6,7 101:20
22:16 23:7	129:2 130:12	276:4 278:17	309:14 360:10	105:9,14 108:2
24:4,15,16,18	131:1,2 133:13	280:15 281:23	362:2	109:6,12 117:6
25:8 27:15	136:7 138:21	284:9 287:12	<b>sustainability</b>	133:12 147:7,7
29:18 34:5,19	142:14 143:9	288:21,23	221:7,10,22	147:8,9 150:14
34:20 36:13	143:12,12,19	289:3 290:10	<b>swear</b> 8:4	180:21 186:8
37:6 39:2 40:6	144:3,6,24	291:8 292:2,5	<b>swing</b> 286:10	197:12 213:6
41:10,20 43:2	145:20 149:2,4	295:4 296:1	<b>switchover</b>	277:16 290:18
43:3 48:1,2,9	149:5 151:3,16	298:13 301:5,6	94:21	326:9 339:11
48:14,16 49:1	152:7 153:9,13	305:3,6,21	<b>sworn</b> 5:10 8:5	339:16 343:18
49:4,4 50:1,9	153:15 154:3,8	307:12,20	8:15 393:8	349:15 359:9
50:10 51:9,22	157:1,4 158:12	308:7,8,8	<b>system</b> 212:17	<b>talked</b> 64:14
52:15,16 54:1	160:13 162:20	311:21 312:6,7	223:21 225:6	79:6 83:1,21
54:1,19,24	163:5,18,19	312:11 314:16	<b>systemically</b>	101:23 102:17
55:12,14 57:6	164:6,16	316:16 319:6	26:17 30:21,24	105:12,13,18
57:11,17,22	165:20 167:10	319:19,20	<b>T</b>	105:22 106:2
58:1,18,20	167:13,23	320:8 321:3,8	<b>table</b> 112:5	106:21,23
59:5 60:2,3,6	168:16,18	323:6 324:1	<b>take</b> 21:17,17	107:17,24
63:18,21 64:16	170:12 171:7	327:8 329:14	61:13 63:14	109:10 113:7
66:7,14,20	171:10,12	329:24 330:6	73:14 132:16	113:11 117:8
67:20 68:14,18	172:15 174:12	333:15,15	134:11,12,16	181:8 196:20
68:20,21 69:12	176:20,21	334:7 335:13	167:18 192:18	198:18 223:16
70:9,14,21,23	177:4 178:11	335:20 336:5	201:14 203:15	235:4,5 245:3
72:2,5,5 73:1,2	178:14,19,19	339:14,19,22	228:23 230:10	245:3,8 261:1
74:14 76:15	178:22 179:10	340:7,11,12	235:22 249:19	261:12 262:12
77:15 78:18	182:18 183:17	343:1 346:15	262:16 269:3	269:11 272:20
79:3,7,8,10	187:6 195:19	347:16 348:3	304:5 319:9	288:22,24
81:23 85:7	197:7 200:17	349:20,23	327:10 355:15	289:4 290:23
86:12,14 87:5	201:3,12	350:9,23,24	362:6	305:4 321:23
87:16 90:10	203:19,24,24	351:20 352:21	<b>taken</b> 1:17 8:8	330:4,5 343:16
91:14,24 92:7	206:6 207:17	355:6,13	73:18 98:16	349:14 353:13
96:12,21 97:12	209:22 214:11	358:19 364:24	145:13,22	<b>talking</b> 12:22
101:16,23	214:18 215:7,8	365:8 368:1,24	146:5 171:21	14:7 27:24
103:15,19,22	216:6 221:23	369:5 371:12	230:13 234:22	29:1 36:23
103:24 105:12	223:12 226:12	373:6 374:7,11	264:23 327:13	43:3 52:7 64:6
105:18,22	226:22 228:17	376:4,16 378:2	389:4 393:9,13	81:7,14 85:15
106:3,10	229:10 235:24	379:7 380:6	<b>takeover</b> 241:17	91:16 93:12
107:15 109:10	244:13,21	381:10 382:15	<b>talented</b> 119:7	129:5,6 134:22
113:9,11,14	246:10,11,22	383:8 384:3,9	143:4	145:8 170:24
114:11 115:13	251:3 256:3	385:11 386:1	<b>talents</b> 225:10	192:13 196:14
115:24 120:22	257:14,15,18	387:11,17,22	<b>talk</b> 21:22 38:22	226:3 227:8,9
120:22 121:7	258:5 259:10	388:2,9,21,23	50:6 51:10	231:16 256:10
121:24 123:7	259:15,16	<b>surrounding</b>	65:1 72:4	276:7 280:18
124:19 125:13	263:8 265:9,12	241:8 325:2	80:24 81:1	287:24 288:13
126:2 127:11	266:2 271:1	<b>suspect</b> 64:21		289:1,9 296:2

Edward Martin, Jr.

June 4, 2019

Page 441

308:5,18 317:2	263:8 269:7	<b>testified</b> 29:15	327:23 377:5	29:21 30:13
320:24 321:4	272:18 276:17	59:7 101:7	<b>things</b> 17:6 23:7	34:17 35:4,6
322:21 326:8	281:24 286:7	259:17 263:17	28:2 30:17	35:15 36:21
352:16 356:14	343:23 345:19	345:14,17	33:18 49:2	37:13,24 41:1
373:7 385:2	345:24 346:1	385:9	50:13 54:3	41:8 42:8
<b>talks</b> 221:24	347:24 354:20	<b>testify</b> 154:5	61:18 63:3	43:15 44:14
250:20 251:5	358:2 368:8,16	385:11	68:22 69:22,23	48:8 51:8,19
323:19 350:14	369:16,22	<b>testifying</b> 82:8	70:2,7 73:9	52:3,16 57:21
388:3,17	373:8 384:15	<b>testimony</b> 13:2,6	80:14 83:21	58:2,11,13,18
<b>Tamara</b> 336:21	384:19,19	13:10 28:5,10	89:15 90:1,15	58:24 59:5,24
<b>Tammy</b> 356:3,6	<b>telling</b> 17:18	29:13,14 36:9	90:21 92:14	59:24 61:9,9
<b>tangible</b> 57:24	90:21 112:13	38:3 57:9 59:8	97:16,19 104:7	61:12,18 62:8
61:15 66:8	187:21 195:12	79:18 82:5	104:9,10 105:6	62:8 64:3
<b>target</b> 353:15	294:21 355:4	90:24 124:15	106:23 111:12	65:13 67:9
<b>targeted</b> 351:13	370:18 371:2	124:16 132:6	113:10 114:24	68:3,14 69:4,7
351:22 352:8	383:15	133:22 180:13	115:24 116:17	71:14 72:15
359:16	<b>tells</b> 94:18	180:16,17	117:9,12,15	74:24 75:8
<b>targeting</b> 140:14	160:15 297:1	182:2 189:14	125:21 139:2	76:8 77:15
141:1	369:15	213:3 226:18	144:6 147:12	78:17 79:3,4
<b>targets</b> 163:23	<b>ten</b> 97:10,11	227:1 259:21	153:16 157:3	84:15 85:1
164:3,9 353:6	205:6 297:4	289:16 306:3	161:12 164:21	86:5 87:3,7
353:21	<b>Tennessee</b> 198:6	381:12,13	167:11 180:1	89:1 90:15,22
<b>tasked</b> 97:20	<b>tenure</b> 239:2	393:7,8	193:10,14,17	91:15 93:7,8
<b>tasks</b> 169:12	<b>term</b> 10:23 14:9	<b>testing</b> 32:3,13	194:4,19 196:7	93:10,17 96:5
<b>taught</b> 364:13	32:15,20 35:24	32:14,24 33:2	196:20 197:3	98:4 102:16
<b>team</b> 119:7	74:18 77:4	33:2	207:13,15	105:17 108:9
355:23 356:13	160:19 206:6	<b>Texas</b> 292:21	213:19 216:23	111:1 114:17
384:20 385:12	209:3 212:12	314:1,11	223:5 234:24	116:4 117:19
385:23,24	212:12 214:11	319:11,13	237:8 244:18	119:18 121:14
<b>tell</b> 8:22 9:2	214:12 216:16	<b>Thank</b> 14:23	248:11 259:7	125:9 127:13
19:11 40:1	217:20 221:20	22:18	276:9 279:24	127:21,22
45:17 64:21	233:5 301:24	<b>thanks</b> 203:12	280:24 285:5	129:12 133:19
74:4 79:11	301:24 309:5	<b>thereon</b> 390:8	285:15 290:11	136:20 138:24
80:8 83:14	336:5 352:15	<b>thereto</b> 391:4	331:8 340:16	140:17 141:20
88:12 94:8	352:17 366:3	393:15	340:17 344:22	143:1,7,19,20
102:10 107:8	376:10 386:8	<b>thing</b> 60:13	345:10 346:7	145:2,4,7,10
114:13,17	388:19	70:21 83:23,24	346:11 361:17	145:19 148:2
117:14 118:8	<b>terms</b> 12:20	85:13 147:3	365:7 369:6	149:4 150:3,7
120:8 129:17	57:19 187:23	151:24 194:4	370:16,24	150:10 151:14
138:12,15	208:5 217:2	204:9 213:19	377:9 379:3,13	151:24 152:5,6
139:3 152:14	259:10 333:16	216:16 217:7	382:14 384:4	153:1,2 154:23
181:15 187:19	374:18	221:9 280:5,8	385:3	156:8,19,20,24
187:19 191:6	<b>terrible</b> 59:1	281:5 288:14	<b>think</b> 8:22 18:19	157:11 158:16
195:9 206:15	268:13	289:8 294:14	24:11 27:9	158:19,19
210:8 256:24	<b>test</b> 387:2	305:5 319:4	28:10 29:3,15	159:6,7 160:21

Edward Martin, Jr.

June 4, 2019

Page 442

161:14 162:12	279:10 284:5,6	356:2,12 358:9	35:13 111:2	192:13 193:6
162:16 164:4	284:11 286:2	360:3,5,24	<b>threat</b> 328:21	194:4,20,23
164:12,15,20	286:11,22	363:9 365:5	<b>threats</b> 333:4,9	195:1,4 196:15
164:21 165:8	287:14,19	366:11 367:11	<b>three</b> 29:10	202:13 203:15
166:17 168:19	288:4,12,22	367:22 370:2	158:6,9 188:15	205:16 207:16
168:22,23	289:3,6,16	371:20 374:15	211:10,24	211:1 212:13
169:5 170:12	290:9 291:21	374:20,20	212:6 269:14	223:3,3,11
170:18 171:2,2	295:15,16	376:11 378:3	269:19 380:6	226:14 229:14
172:14 175:9	297:11 298:15	378:16 379:1,9	<b>three-point</b>	230:21 231:7
177:3,6 178:11	298:16 299:1	380:1,16 381:4	278:12	232:4,11
178:13,20	301:16,17	381:6,8 382:13	<b>three-prong</b>	233:16 237:18
179:7 180:1,6	302:1 305:20	383:7,7 384:8	256:6	237:21,24
180:19 182:24	305:20 306:18	385:5,24,24	<b>three-pronged</b>	239:5,11
186:2,13,20	307:12,13	386:2,16,16,21	255:1 256:8,13	240:23 241:4
188:4,17 189:8	308:3,8,19	386:23,24	256:17 269:5	241:14,15,16
189:13,18,20	309:5,12,24	387:9,10,19	269:10	248:9 249:20
190:20,22	310:24 311:1	388:20,20	<b>throw</b> 157:16	252:8 256:18
191:10 192:15	312:14 313:7	<b>thinking</b> 100:17	<b>Thursday</b>	257:15,21,23
192:15,23	314:8 315:12	<b>thinks</b> 47:20	100:16 247:15	262:6 263:24
197:24 198:2,5	315:18 316:4	<b>third</b> 156:7	295:18	265:10 271:14
200:7,8 206:3	316:19,22	158:23 200:14	<b>tie</b> 350:5,7	273:24 274:3
206:8 207:14	317:7,16,18	200:14,14	<b>tied</b> 378:23	275:21 276:3
207:15 209:3	319:18 320:2	250:15 375:9	<b>Tim</b> 102:15,18	282:24 283:11
214:4 215:7	320:16 321:10	376:2 379:18	<b>time</b> 7:3 8:17	283:14 284:1
218:9,10 220:8	323:16 326:19	379:19	13:3 25:2,3	284:10,11,20
224:8 227:16	326:21,22,24	<b>this'</b> 322:17	31:1 32:9 33:4	285:12 287:22
231:21,21	327:1 330:4,5	<b>thought</b> 19:8	34:2 39:1,10	290:9,10
233:4,4 236:23	330:20,24	36:10 75:9	39:17,20 44:11	303:11 306:15
241:17 242:12	334:2 336:19	76:18 85:17	45:9,22 50:10	318:20 328:20
242:18 243:17	336:23 340:1,4	87:2 89:20	51:18 53:1	330:7 331:2
244:11 245:18	340:21 342:3	117:4 122:20	77:20 83:4	335:13 344:5
246:9 248:1	343:16,24	136:14 157:1	84:16 91:16,18	354:16 361:2
249:21 252:1,8	344:1,1,5,7,21	159:19 189:7	94:3 101:24	374:22 376:3
253:8 254:2,7	345:6,9,17	222:14 227:15	104:8 105:23	385:5,8 389:15
255:24 257:13	346:14 347:3	260:10 262:6	107:10 108:5	<b>timeline</b> 387:21
257:18 258:4,8	347:16 348:7,9	264:3 279:15	109:1 110:17	<b>times</b> 15:19
258:15 259:9	348:14 349:3,4	284:10 285:13	116:15 125:6,7	27:17 50:12
259:17 262:11	349:7,11,14,19	286:8 288:21	125:8 128:17	63:11 67:7
265:11 267:23	349:22 350:8	326:5,8,10	130:16,24	69:21 73:8
268:4 269:14	350:12 351:3	333:11 337:6	132:22 136:21	82:19 162:17
270:24 271:1,7	351:10,10,19	348:10 385:9	137:4 145:10	164:5 229:15
272:19 273:8	351:19 352:2	<b>thoughts</b> 356:19	149:14 150:8	234:23 252:8
273:19 274:4	352:15,22	<b>thousand</b> 125:1	159:15 174:13	306:9 309:1,22
275:18 276:2	353:22 355:2,2	<b>thousands</b> 224:3	176:7 181:5	310:1 333:24
278:10,22	355:4,23,24	<b>thread</b> 25:5,6	189:22 192:5	384:4

Edward Martin, Jr.

June 4, 2019

Page 443

<b>timing</b> 20:23 23:8 25:8 29:10 77:18,19 81:3 89:8,9,13 89:18,24 90:5 90:7 91:6 96:21 97:1,2 98:9,11 101:21 105:12,18 116:15 142:24 158:17 169:18 189:18,20 257:19 258:5 275:15 295:16 296:1,15 306:6 342:7 349:23 354:20 360:23 361:16 384:9	373:22 376:18 383:20 <b>tomorrow</b> 99:10 99:14,18 100:9 168:23 257:6 297:2 <b>tool</b> 33:3 112:4,7 112:24 219:14 <b>toolbox</b> 33:3 <b>tools</b> 90:12 112:5 <b>top</b> 46:2 87:12 88:15 99:12 136:12 151:8 220:23 235:1 250:16 256:3,4 282:15 347:9 358:14 <b>top-notch</b> 376:20 <b>topic</b> 102:5 240:8 324:21 <b>topics</b> 387:23 <b>total</b> 155:23 177:19 200:17 <b>totaling</b> 23:13 23:19 <b>totally</b> 186:12 371:11 <b>touched</b> 245:19 <b>tough</b> 275:21 370:8 <b>tougher</b> 216:16 216:16 <b>toying</b> 223:7 <b>TPP</b> 348:5 371:7 371:12,19 <b>track</b> 193:5 194:15,17 327:1 <b>trade</b> 213:10 324:4 338:6,14 371:21 <b>trademark</b> 47:10 49:8,12	52:13,20 53:6 53:15,22 191:22 235:21 238:1,12,15,23 239:1 241:9,16 284:14 <b>tradename</b> 235:9 236:3 <b>traditional</b> 223:19 <b>Trans-Pacific</b> 371:20 <b>transaction</b> 140:9 141:7 <b>transactions</b> 72:9 73:5 <b>transcribed</b> 8:10 <b>transcript</b> 4:21 <b>transfer</b> 85:5 <b>transferred</b> 76:23 <b>transfers</b> 71:19 <b>transition</b> 196:4 196:14,15,21 198:7 <b>trashing</b> 43:8 <b>treasurer</b> 58:23 59:8,9 65:16 122:2 127:15 154:22 181:19 <b>tried</b> 37:15 69:21 254:9 266:18 279:8 279:24 280:5,8 281:1,5 291:5 291:12 292:3 292:10 293:13 293:19 326:24 348:9 <b>trouble</b> 60:2 <b>true</b> 12:9 43:20 44:19 46:9,15 46:17,21,21,23 47:2,6 77:7 119:2 195:3	201:15 207:8 208:3,12,15 212:24 213:12 218:24 230:18 231:3 238:11 279:22 280:4 298:20,21 301:21 309:21 328:24 338:18 339:2 370:24 372:21,22,23 380:10,12 382:7,22,23 390:6,11 <b>Trump</b> 28:19 29:24,24 30:15 38:13 80:19,20 81:5 83:1 90:10 92:6 94:2 100:11,21 103:5 163:5,9 165:18 196:2 200:10 212:15 213:1,4 257:21 260:11 267:16 276:11,14 279:15 280:13 286:9,11 307:14 311:22 317:4 321:7,8 324:14,15,18 324:21 348:5 348:17,24 354:3 356:20 357:8 365:24 377:24 378:2 380:21 <b>Trump's</b> 213:11 263:21 279:17 <b>Trumper</b> 321:11 <b>TrumpTru.com</b> 160:6 161:5,8 <b>trust</b> 19:10 33:16,20,21,23 45:8,11,20,24	62:4 65:5 69:9 70:19 72:10 126:19 143:6 179:5 185:20 205:23 208:8,9 248:6 292:11 307:16 366:12 <b>trustee</b> 45:7 <b>try</b> 36:13 37:7 72:1 92:14 101:3,12,14 103:4 153:12 158:13 159:8 165:17 226:4 240:2,19,19 266:21 293:12 378:3 <b>trying</b> 10:20 22:12 28:15 29:7,13,20 30:1,17,17,23 32:7,18 39:11 54:22 68:3 100:12 101:17 104:5,8,11 112:21 129:3 130:20 135:24 136:9 142:4 156:8 166:22 186:5 187:9 190:10 217:22 218:21 236:22 240:12,15 257:23 278:13 286:13 288:16 288:18 291:9 322:20 349:5 354:17 358:22 367:14 379:11 385:8 <b>Tuesday</b> 100:11 100:16 <b>tumult</b> 31:13 <b>tune</b> 358:22 <b>turn</b> 300:10
--	---	--	---	--

Edward Martin, Jr.

June 4, 2019

Page 444

302:4 350:2 <b>turned</b> 237:8 <b>turning</b> 94:20 <b>two</b> 23:13 28:22 32:16 51:12 75:2 84:3 87:18 88:2 109:23 145:11 156:12 171:5 176:14 188:10 194:1 207:1 211:10,22,24 212:1,2 216:22 256:24 263:24 294:13 300:10 341:16,19 360:6 365:23 369:23 385:6 <b>two-thirds</b> 301:1 <b>two-year</b> 223:17 <b>Tyler</b> 6:10 7:21 <b>type</b> 174:16 <b>types</b> 60:10 119:1 148:18 174:15 242:2 242:10 <b>typewriting</b> 8:11 393:10 <b>typewritten</b> 203:21 <b>typo</b> 34:21 126:11,13,15 151:2 386:2,2	314:13 375:8 <b>umbrella</b> 71:18 <b>UN</b> 196:9 214:6 <b>unclear</b> 10:17 322:16 323:8 356:16 <b>undergrad</b> 172:19 <b>understand</b> 11:22,23 14:6 17:11 19:23 45:10,19 57:10 62:23 69:23 75:17 76:4,9 78:3 81:23 82:9 94:1 107:16 116:10 118:24 119:5 123:9 126:3 128:22 131:20 182:10,18,19 190:5,7,11 205:11 208:20 209:5 210:4 213:17 224:17 225:19,23 226:7,23 231:22 233:7 234:9 235:4,8 236:16 254:1 263:7 266:11 266:18,19 271:23 291:17 333:3 334:7 338:15 345:15 345:19,19,24 346:1,2 372:1 372:10 <b>understanding</b> 18:2,15 19:4 23:18 36:15 59:12 63:6 68:8 71:6 92:22 93:5 119:3 164:8	180:8 185:5 207:11 272:6,7 272:9 284:17 298:7 302:15 348:4 351:17 353:19 354:3,6 354:10 381:17 381:18 <b>understands</b> 291:9 292:5 <b>understood</b> 90:16,20,22 95:7,9 177:23 178:2 193:22 203:1,4 204:2 205:8 208:22 209:2 211:7,13 213:24 214:9 215:11 216:8 218:5,7 219:18 221:19 224:1 224:23 228:19 229:3,11,21 230:1 231:17 236:1,12,16 237:2 238:17 248:11,20 298:10 303:23 311:6 318:20 318:24 319:21 <b>unfair</b> 191:22 <b>unhappy</b> 371:16 <b>unhelpful</b> 353:17 <b>unincorporated</b> 71:5,12 <b>unintentional</b> 126:20 <b>unique</b> 225:10 332:7 <b>uniquely</b> 332:8 332:21 <b>United</b> 1:1 5:1 5:18 7:7 88:19 224:4 225:1,21	226:9 227:13 227:21 228:4,5 228:20 229:6 238:21 239:8 <b>universe</b> 34:18 79:9 86:5 108:24 <b>unquote</b> 65:15 273:22 <b>UNSELL</b> 6:18 <b>update</b> 63:1 <b>updates</b> 229:5 229:12 <b>upset</b> 275:16,22 370:16 371:1 <b>use</b> 14:13,15 32:2 34:15 37:14,21 38:9 38:9 55:2,22 56:2,9 57:19 112:4,4,8,8 116:8 121:20 123:3 160:19 205:4 216:15 236:10 238:16 239:4 242:6 254:1 258:18 264:19 283:19 287:15 292:21 309:6 329:15 334:4 352:17 356:17 364:22 367:7,14 378:18 380:17 381:1,11,14,19 381:20 382:10 382:12,19 383:11,18 386:8 <b>useful</b> 212:12 <b>usually</b> 225:8 <b>Utah</b> 155:16,24 156:4,10,11 337:14,15 340:9,19 341:9	<b>utilize</b> 346:10 <b>utilizing</b> 258:17 <hr/> <b>V</b> <hr/> <b>vague</b> 11:5,16 12:13 21:13 22:4 30:3 35:18 37:11 38:6 39:7,14 54:8,17 55:5 57:4 97:18 109:8 118:13 121:12 133:17 178:4 218:10 219:3 228:15 233:15 242:4 243:24 244:10 264:6 265:7,24 276:24 277:12 378:11 <b>valuable</b> 192:13 217:1 285:6,7 288:5 310:18 <b>value</b> 246:6,8,10 246:11,15 247:3 <b>values</b> 118:22 201:7,18 223:17 <b>various</b> 67:7 69:21 83:13 162:17 164:5 187:9 198:20 199:2,23 243:11 251:8 251:14 252:8 273:11 310:1 320:19 333:24 384:4 <b>varying</b> 234:20 <b>vehicle</b> 103:9,14 111:16 217:3 260:10 <b>vendors</b> 63:12 153:9,20
--	---	---	--	---

Edward Martin, Jr.

June 4, 2019

Page 445

<b>version</b> 114:5,14 386:24	89:20 262:10 263:11 264:16	279:18 290:15 294:22 297:14	167:8 184:19 213:9 214:4	363:1 367:5,6 374:13 375:1
<b>versus</b> 7:5 111:9 114:15 191:16 193:7,8 195:2	267:16 279:14 279:14,16 307:14 338:20	299:2 309:16 350:10,11 359:7 387:23	217:19 218:16 219:1 232:20 233:22 252:17	376:11 <b>ways</b> 59:13 70:4 106:1 165:9
<b>veterans</b> 114:8	<b>voices</b> 44:10	<b>wanted</b> 21:16	254:6 255:20	179:14 225:14
<b>veterans'</b> 114:23	<b>volume</b> 380:20	44:11 60:20	270:14 275:3	257:23 288:17
<b>vetted</b> 330:16	380:20	93:11 100:6	280:14 288:14	<b>WC</b> 370:4
<b>Vicki</b> 337:9	<b>volunteer</b>	103:10 104:16	289:7 296:9	<b>WCB</b> 370:6,13
<b>victory</b> 38:13 365:24	315:21	104:16 111:13	302:10 305:8	<b>we'</b> 322:16
<b>video</b> 138:16 149:5	<b>volunteers</b> 201:5 201:17	112:1,14,17,20 135:21 137:2	305:24 307:18 307:23 308:16	<b>we'll</b> 14:14 50:6 132:16 134:17
<b>Videographer</b>	<b>vote</b> 145:1,1,6 145:13,23	144:17 163:14 164:14,15	308:22 311:2 319:23 320:1	157:4 <b>we're</b> 12:19,22
6:24 7:1 8:3	146:19 300:24	175:15 178:23	320:11 324:20	23:13 25:9
73:16,19 98:14	301:8,11,12,14	188:12 216:18	324:21 334:3	29:1,6,11,20
98:17 171:19	<b>voted</b> 301:4	222:8 249:1,16	335:11 351:23	30:1,18 42:21
171:22 230:11	<b>voter</b> 114:1,5,14	260:24 262:9	372:3,5 378:6	44:15 55:8
230:14 264:21	116:2 117:1	264:8,12,15,16	<b>waste</b> 192:12	65:19 72:6
264:24 327:11	118:9 124:23	265:11,11	<b>water</b> 22:14	73:16,19 92:5
327:14 389:2,5 389:20	<b>votes</b> 145:8,11	267:16 270:11	107:6	118:18 128:23
<b>videotaped</b> 1:15 5:9 7:2	<b>voting</b> 164:1	276:9 279:15	<b>way</b> 11:9 13:12	134:21 142:13
<b>views</b> 90:10	<b>vs</b> 1:8 5:4 391:2	280:17 307:13	13:21 26:11,16	153:15 159:16
<b>violations</b>	<b>W</b>	340:4 347:6	37:4 40:21	171:19 182:7
116:23 118:2	<b>wages</b> 186:1	353:24 354:2	51:1 56:17	191:4 195:24
372:2,11	<b>Wagner</b> 371:8	354:12 380:1	62:6 64:21	230:11 254:11
<b>Virginia</b> 58:11	<b>Wait</b> 194:13	383:17 384:5	65:19,20 82:16	264:24 296:2
60:3 94:16	<b>waived</b> 8:12 211:15	<b>wanting</b> 130:4 136:23 227:6	89:23 97:14	301:11 329:18
152:21 172:3,6	<b>Walsh</b> 130:19	<b>wants</b> 147:6 150:12 294:16	100:13,22	332:19 339:9
298:12,19,19	132:19	295:19	108:14 141:16	348:11 350:11
299:17	<b>want</b> 13:18 14:14 20:9	<b>Washington</b>	143:20 147:23	352:16 356:14
<b>virtue</b> 244:18	22:9,13 26:1,6	207:5,21	160:18 162:8	369:18,23
<b>Visa</b> 171:5,6 370:18	35:14 67:22	292:14	167:12 178:21	379:10 385:3
<b>vision</b> 26:23	80:8 82:7 91:4	<b>wasn't</b> 16:24	208:11,18,19	389:2,14,19,20
27:11 44:17	100:8 112:22	24:22 25:1	210:9 217:21	<b>we've</b> 49:1 60:6
64:17 71:16	116:16 129:1,3	33:1 56:5,5,6	219:12 227:12	67:7,7,8,9
181:9,23 182:3	133:1 150:11	76:15 83:22,22	229:9 235:3	69:21 72:4,16
182:17,22	181:8 186:7	83:24 87:5	237:6 245:2	73:8,9 74:8
184:18,24	192:14,17	95:20 104:10	249:1,13	78:3 125:9
212:15 233:10	204:8 209:19	104:23 112:15	252:15 258:15	131:8 135:11
317:3,10	222:4 233:8	133:2 136:5,8	266:14 272:15	180:20,23
<b>voice</b> 44:16 87:5	251:4 257:20	146:10,12	278:11,11	268:24 312:6
		151:15 163:7,8	287:12 329:6	387:20
			342:16 343:12	<b>wealthy</b> 358:15
			354:8 356:15	<b>website</b> 39:12,17



Edward Martin, Jr.

June 4, 2019

Page 446

39:20 160:5	<b>White</b> 196:19	189:18	174:16 175:8	325:1 331:10
163:11 170:7	197:4 350:6,7	<b>wish</b> 352:1	176:11,14	331:14 369:10
170:15,15,19	350:10,12	353:23 354:21	185:19 187:24	373:18 384:20
243:3 247:7,14	<b>wife</b> 343:16	<b>witness</b> 8:4,11	188:11 189:3	<b>works</b> 142:20
248:1,4,5,12	<b>William</b> 337:13	192:16 393:6,8	189:11,16	162:3 170:13
248:21 249:3	<b>willing</b> 100:18	<b>woman</b> 29:8	191:8,9,12,15	179:18 213:18
249:17 347:15	100:24 101:8	93:12 184:17	191:18 193:2	336:3 354:9
382:12,14	<b>Wilson</b> 74:16,17	346:23	193:10,19,24	<b>world</b> 213:17
<b>websites</b> 165:23	75:3 78:22	<b>women</b> 140:14	194:3 195:24	291:8,17
166:15 167:15	79:19 80:9,15	141:1	198:1 202:10	324:20 340:16
<b>Webster</b> 116:8	81:4,10,17,19	<b>won</b> 27:12	202:12 223:10	356:20 357:8
370:13	82:21,24 83:7	<b>wonder</b> 337:23	223:14 224:10	<b>worried</b> 330:23
<b>Wednesday</b>	83:16 84:2,5,8	339:8	232:23 233:22	<b>worry</b> 35:23
100:16	84:10,17,20	<b>Wood</b> 6:19	234:3 236:1,9	190:12
<b>week</b> 100:17	85:5,6,19	<b>Woodrew</b>	236:12,17,19	<b>worth</b> 189:3,5,6
138:1,19	91:13 116:6	337:13	237:3 239:24	191:12 197:7
140:10 144:5	137:22 152:16	<b>word</b> 12:14,17	240:17,18	218:3 357:13
368:17	160:4 161:21	14:15 34:9,15	243:19 259:10	357:23 358:3
<b>weekly</b> 30:16	161:24 163:10	57:10 63:7	276:6 331:2,4	<b>worthwhile</b>
<b>weeks</b> 29:10	165:24 167:17	82:6 121:20	331:5 335:17	333:11
31:20 33:9	170:11 257:12	122:21 123:3	338:22 345:22	<b>Wotring</b> 51:4,13
89:1 124:22	258:2,10,13,19	235:22 242:17	349:2 355:24	74:13 75:3
156:12 183:5,7	259:2 260:3	247:21,23	364:14 369:1,6	87:17,19 88:2
194:3,4	282:19,21	249:19 254:2,9	374:17 384:6,7	88:4,16 91:13
<b>welfare</b> 242:3,5	283:4,6,15	254:10 283:20	384:24 385:1,7	92:19 94:18,24
242:10	290:3,5,18,20	286:20 290:22	385:21	103:18 113:22
<b>went</b> 21:4 27:20	293:22 294:19	298:5 303:1	<b>worked</b> 35:22	120:12 129:23
66:16 82:23	294:21 295:6	304:5 307:13	40:15 70:12,15	139:22 144:1
161:11 174:13	295:19 348:5	345:15 346:1	70:19 83:4	148:13,17
191:16 226:13	355:23 356:13	<b>words</b> 46:22	84:5 90:21	155:10 299:20
226:15,16	358:21 384:19	217:23 258:18	120:24 162:14	303:2 304:22
227:4 241:5	384:19 386:1	364:22	221:5 311:20	306:23 342:21
259:24 260:12	387:18	<b>work</b> 11:9 13:16	326:23 348:8	<b>wouldn't</b> 13:20
305:20 306:9	<b>Wilson's</b> 77:23	13:17 14:4	358:5 386:22	40:20 137:1
315:6 317:8	79:12 80:2	21:2 23:2	<b>working</b> 39:16	144:19 150:2,6
333:16 339:13	87:3 383:22	27:24 30:10	59:1 67:8	151:14 277:18
385:10	<b>win</b> 43:7 112:21	37:8,15,21,23	81:12,16,18	331:21 351:9
<b>weren't</b> 14:1	<b>wins</b> 271:11	59:12 69:1	114:9,10	<b>write</b> 32:2 33:7
25:6 109:11	<b>wire</b> 130:4	70:4 71:9,14	117:22 169:1	99:9 188:16
117:15 136:9	135:21,24	78:13 83:5	175:16,22	287:9,10 297:6
189:14 241:3	136:9,23 137:8	93:16 97:14,23	214:14,18	374:14 375:3
311:23	154:18	98:2 111:21	256:7 262:10	384:22
<b>wheel</b> 248:19	<b>wired</b> 135:19	117:13 121:18	273:3,4,6	<b>writer</b> 141:15,16
<b>whichever</b>	<b>wiring</b> 130:7	122:19 126:12	274:4 285:3	143:5,7 283:17
283:20	<b>wise</b> 105:13	128:21 174:13	319:24 320:5	283:18



Edward Martin, Jr.

June 4, 2019

Page 447

<b>writers</b> 141:22	51:7 54:24	143:6 171:6	<b>10:43</b> 254:24	<b>13th</b> 75:7
<b>writes</b> 20:12	55:21 58:7,13	173:8 207:16	<b>10:58</b> 98:15	<b>14</b> 2:12 3:14
42:14 116:7	62:9 64:4	208:4 219:15	<b>1000</b> 5:15 6:3	155:10 169:13
137:22 269:23	65:13 66:6	223:23 233:17	<b>10017</b> 172:5	327:3,7,17
271:10 291:11	69:3 74:10	268:8 364:15	<b>101</b> 6:15	343:8,13
295:6	79:11 82:2	<b>yep</b> 25:18 70:1	<b>1020</b> 177:2	<b>141</b> 3:6
<b>writing</b> 55:10	92:17 100:4	80:7 127:17	<b>1031</b> 126:16	<b>148</b> 3:7
128:14 143:11	102:6 107:5	131:19 154:6	<b>105,000</b> 124:13	<b>148,000</b> 140:8
358:18 360:15	110:19 121:16	157:23 158:10	126:8	<b>149</b> 3:8
378:24 381:3,7	123:16,24	159:2 174:5	<b>1099</b> 68:6,8,21	<b>15</b> 2:13 42:13
381:9	131:24 137:16	183:3 187:7	68:23	116:6 217:20
<b>writings</b> 29:6	142:21,24	195:11 206:20	<b>1099s</b> 68:12	217:21 337:16
37:23 248:18	151:9,21 153:7	225:18 254:21	<b>11</b> 252:23	337:20 341:13
383:18	155:19 156:17	270:3 299:10	253:10 257:3	341:15 343:2
<b>written</b> 38:10	160:17 177:3	304:8 369:14	269:9 277:9,23	<b>150,000</b> 177:19
48:21,22,24	194:6 202:14	388:5	283:15,22	185:23 191:12
49:3 139:5	205:17 207:11	<b>York</b> 27:17	284:13,18	<b>152</b> 3:9
201:12 270:3	210:1 220:9	100:16	298:3 299:15	<b>155</b> 3:10
288:8 345:12	225:3 231:9	<b>younger</b> 355:15	<b>11:00</b> 98:18	<b>159</b> 3:11
345:22 346:5	232:2 241:23	<b>YouTube</b> 353:2	<b>11:09</b> 269:10	<b>16</b> 2:14 214:17
355:22	242:23 244:13		276:1	299:9 340:22
<b>wrong</b> 25:1	245:5,20 246:9	<b>Z</b>	<b>11:35</b> 171:23	341:2 342:16
46:18 153:11	246:20,21	<b>zip</b> 96:16,20	<b>113</b> 2:21	<b>161</b> 3:13
192:15 226:19	247:23,24	<b>0</b>	<b>115</b> 2:22	<b>166</b> 3:17
<b>wrote</b> 27:17 31:5	250:24 251:17	<b>06</b> 174:13	<b>11th</b> 254:24	<b>168</b> 3:18
128:7 134:23	256:16 264:18	<b>1</b>	278:20 282:19	<b>169</b> 3:19
167:10 188:20	266:16 269:2,4	<b>1</b> 2:5 5:14 6:3	<b>12</b> 2:10 247:15	<b>17</b> 2:15 129:23
188:21 255:1	271:5 273:8	7:13 139:22	304:4,10,16	130:9,13
284:16 322:11	283:3 289:18	140:22 144:1	305:7,17 313:8	135:23 160:4
326:14 337:6	294:7 306:18	203:7,10,21	313:12 325:21	342:10,14
372:22 382:23	308:1,12 310:7	204:14,16,19	325:22	344:11,14
<b>www.eagle</b>	310:24 330:17	204:20,22	<b>12:20</b> 171:20	<b>17,744.15</b>
247:7	338:18 351:8	205:1 211:4	<b>120</b> 2:23 6:7	140:20 141:6
<b>www.eaglefor...</b>	357:7 370:2	222:9 255:2	<b>1280</b> 6:15	<b>17th</b> 130:1
243:3 247:14	386:8 387:1	291:2 353:11	<b>129</b> 2:24	132:23
<b>X</b>	<b>year</b> 26:2 82:24	<b>1,500</b> 335:16	<b>12th</b> 306:16	<b>186</b> 3:20
	83:8 98:10	336:12,22	<b>13</b> 2:11 175:21	<b>19</b> 155:15
<b>Y</b>	172:21 173:11	<b>1:35</b> 171:23	321:12,16	<b>195</b> 3:21
<b>yeah</b> 9:2,4 12:7	195:13 214:16	<b>10</b> 2:9 310:2,6,8	324:19,23	<b>1972</b> 207:21
14:2,11 16:21	219:13,13	<b>10,000</b> 374:14	325:4,7 354:14	<b>1975</b> 201:1
17:4,16 19:14	344:7 376:3	<b>10:09</b> 130:1	<b>1312</b> 155:23	<b>1991</b> 207:12
21:14 28:14	385:6	<b>10:11</b> 73:17	<b>1316</b> 157:22,24	<b>1992</b> 172:22
34:11 35:20	<b>years</b> 33:19 41:9	<b>10:28</b> 73:20	158:1	<b>1995</b> 212:15
42:3,9 47:6	79:20,22 90:13		<b>137</b> 3:4	<b>1998</b> 172:16
	117:22 141:22		<b>139</b> 3:5	

Edward Martin, Jr.

June 4, 2019

Page 448

<b>2</b>	88:23 89:6,10	384:9 389:11	<b>289</b> 4:6	<b>322</b> 205:21
<b>2</b> 255:4 313:17	89:16 96:11	<b>2017</b> 160:4	<b>28th</b> 372:18	206:5 302:8,13
324:21	97:15 106:4	163:10 164:10	373:13,15,18	304:22 305:8
<b>2:40</b> 230:12	113:22 115:23	169:15 187:8	<b>29</b> 187:14	305:14,17
<b>2:55</b> 230:15	116:6 124:14	187:14 188:8	189:10 368:12	306:4,20
<b>20</b> 134:15	125:17 128:14	189:10 190:3	375:7	<b>327</b> 2:12
175:19 390:14	128:18 129:23	193:3 195:12	<b>294</b> 4:7	<b>337</b> 2:13
<b>20,000</b> 333:24	130:9,13	220:19,21	<b>297</b> 2:8	<b>340</b> 2:14
<b>200</b> 300:5	135:23 137:23	368:12 369:8	<b>29th</b> 379:12	<b>342</b> 2:15
358:10 373:4	138:11 139:22	369:15 373:8	382:18	<b>347</b> 3:12
<b>200,000</b> 152:20	140:8,16,22	375:7 386:15	<b>2nd</b> 326:11	<b>35</b> 2:16 359:1,5
372:19	141:2 144:1	<b>2018</b> 348:6	<b>3</b>	359:20 360:3,6
<b>2000</b> 214:16	145:24 146:8	<b>2019</b> 1:18 5:11	<b>3</b> 6:19 75:4	360:10,18,21
<b>20003</b> 207:5	146:11,12,17	7:3	87:18 88:2	361:4,8,11,14
<b>2001</b> 173:22,23	147:13,21	<b>203</b> 2:5 207:4	222:11 255:4	<b>350</b> 358:10
238:3	148:14 152:18	<b>206</b> 3:22	291:22 323:19	<b>359</b> 2:16
<b>2002</b> 173:20	154:21 155:10	<b>20th</b> 342:3	325:12	<b>36</b> 359:5,20
174:6	155:16 159:5	<b>21</b> 295:5,18	<b>3,000</b> 159:1	361:19,24
<b>20026</b> 172:6	177:7,10,12,18	296:4,7,11,16	<b>3:16-CV-0094...</b>	362:8,13 363:2
<b>2004</b> 174:6,12	187:8 212:14	<b>219</b> 3:23	1:8 5:4	<b>368</b> 4:8
<b>2006</b> 174:12,20	212:19,22	<b>22</b> 331:9 341:16	<b>3:34</b> 264:22	<b>37</b> 2:16 359:1,5
174:22	213:5,12,24	<b>2214</b> 151:6	<b>3:39</b> 295:18	359:20 360:6
<b>2008</b> 174:24	214:2,6,9,14	<b>22nd</b> 342:3	<b>3:45</b> 265:1	360:10 362:15
175:1,7	214:19 216:1	<b>235</b> 2:6	<b>3:47</b> 295:5	363:13,18
<b>2013</b> 175:20,21	222:1,5,8,15	<b>247</b> 2:7	<b>30</b> 207:16	366:22
<b>2014</b> 363:19,21	243:22 247:15	<b>25</b> 3:15 15:5,22	<b>300</b> 155:16,22	<b>38</b> 3:16
364:7 379:15	252:23 253:10	20:20 21:9	197:13	<b>384</b> 4:9
<b>2015</b> 40:9 41:18	257:3 269:9	22:2,20 24:7	<b>300,000</b> 188:12	<b>386</b> 4:10
83:10 121:10	277:9,23 281:8	24:12 195:12	188:17	<b>389</b> 4:11
175:5,7 176:22	282:19 283:16	207:16 233:17	<b>301</b> 205:21	<b>3rd</b> 75:8,10
220:19,21	283:22 284:13	369:15	304:23	99:18 100:9
222:17 285:15	284:18 295:5	<b>25,000</b> 334:1	<b>30th</b> 124:14	104:2,19
286:11 299:9	295:18 296:4,7	<b>250</b> 197:13	<b>31</b> 140:8	105:10,14,17
<b>2016</b> 8:21 9:1	296:11,16	<b>250,000</b> 195:13	<b>310</b> 2:9	<b>4</b>
12:24 13:4,13	298:3 299:15	<b>254</b> 3:24	<b>313</b> 2:10	<b>4</b> 1:18 7:3
15:5,22 20:21	300:22 302:5	<b>25th</b> 35:9 369:12	<b>314</b> 6:4	148:14 152:18
21:6,9 22:2,20	304:4,10,16	<b>26</b> 25:22 28:18	<b>314)606-6462</b>	154:21 334:2
24:7,12 25:22	305:7,17 306:5	87:17 88:1	110:3	<b>4:50</b> 327:12
28:18 38:11	312:12 313:2	<b>268</b> 4:4	<b>314)725-6003</b>	<b>4:58</b> 327:15
39:9 42:13	313:17 318:8	<b>26th</b> 75:4,9	110:6	<b>40,000</b> 23:14,19
43:20 44:20	324:8,21 331:9	<b>28</b> 137:23	<b>316</b> 207:4	372:21 373:3
45:19 75:4	341:4 360:8	138:11 207:16	<b>316-CV-00946...</b>	<b>400</b> 373:9
81:10,15,16	362:20 366:10	208:4 341:4	7:6	<b>400,000</b> 373:22
82:22 83:11,16	366:17 370:7,9	<b>28,000</b> 152:19	<b>321</b> 2:11	<b>42</b> 223:22
87:17 88:1,16	383:16,20	<b>282</b> 4:5		

Edward Martin, Jr.

June 4, 2019

Page 449

<b>43</b> 2:17 73:21 74:1,8,11,20 75:2	<b>6:07</b> 389:3 <b>6:08</b> 389:6 <b>6:09</b> 389:21,23 <b>60</b> 2:24 129:13 129:17 135:17 135:18 <b>60s</b> 237:9 <b>61</b> 137:15 <b>618</b> 207:2 <b>62</b> 3:4 137:12,13 <b>62002</b> 205:22 <b>62095</b> 6:19 <b>62202</b> 207:2 <b>63</b> 3:5 139:15,19 139:21 <b>63105</b> 5:15 6:4,8 6:12,16 7:14 <b>64</b> 3:6 141:10,13 143:13 149:8 <b>65</b> 3:7 148:9,13 <b>66</b> 3:8 149:20,24 150:18 <b>67</b> 3:9 152:8,12 <b>69</b> 3:10 155:1,5 <b>6th</b> 6:19 92:19	<hr/> <b>8</b> <hr/> <b>8</b> 2:2,7 247:9,13 247:13,17,20 249:10 294:6 373:8 389:11 <b>80</b> 3:15 25:12,16 25:19 <b>800,000</b> 188:16 <b>80s</b> 329:4 <b>81</b> 3:16 38:16,20 38:22 45:7 46:2 <b>82</b> 3:17 166:9,13 <b>83</b> 3:18 168:3,6 171:1 <b>84</b> 3:19 169:23 170:3 171:9,14 <b>85</b> 3:20 186:23 187:3,3 188:4 <b>86</b> 3:21 195:5,9 <b>863-7733</b> 6:4 <b>87</b> 3:22 206:10 206:14,21 <b>88</b> 2:18 3:23 219:22 220:3,3 220:16 <b>89</b> 3:24 254:15 254:19 260:16 260:20 <b>8th</b> 373:12,13,16	<b>93</b> 4:7 294:8,12 294:18,21 <b>94</b> 2:19 4:8 368:4,8 383:19 <b>95</b> 4:9 384:11,15 384:16,18 <b>96</b> 4:10 386:10 386:14,14 <b>97</b> 4:11 389:7,10 389:16 <b>98</b> 173:10 <b>99</b> 2:20	
<hr/> <b>5</b> <hr/> <b>5</b> 2:6 106:4 147:13,21 235:12,16,20 236:4 238:2,13 292:19 334:2 <b>5-digit</b> 96:16 <b>5,000</b> 138:3 200:16 374:15 <b>50</b> 90:13 <b>50,000</b> 387:12 <b>501(c)(3)</b> 350:19 350:21 <b>501(c)(4)</b> 203:2 253:1 265:4,16 298:23 <b>50s</b> 41:12 <b>53</b> 2:20 99:1,5,9 <b>56</b> 2:21 113:15 113:19 <b>57</b> 2:22 115:15 115:19 116:3 <b>59</b> 2:23 120:4,8 128:6 139:6 <b>5th</b> 104:12 111:18 112:10 112:14	<hr/> <b>7</b> <hr/> <b>7</b> 163:10 164:10 293:6 <b>7:00</b> 17:3 <b>70</b> 3:11 159:21 160:1 <b>70-plus</b> 364:15 <b>700</b> 6:8 <b>73</b> 2:17 3:12 347:17,21 <b>75,000</b> 177:19 177:20 <b>76</b> 3:13 161:15 161:19 <b>7700</b> 6:11 <b>79</b> 3:14 14:18,22 15:2,12,23 16:2 34:24 <b>7th</b> 6:12	<hr/> <b>9</b> <hr/> <b>9</b> 2:8 297:11,18 297:22,22 298:1 299:11 300:22 303:12 309:3 <b>9:08</b> 7:4 8:17 <b>90</b> 4:4 268:14,18 282:2,5 <b>900</b> 155:18,23 158:6,8 <b>91</b> 4:5 282:10,14 282:17 <b>92</b> 4:6 289:20,24		
<hr/> <b>6</b> <hr/> <b>6</b> 88:16 89:10 113:22 222:9 293:2				